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**Religion and the Death Penalty in Derrida’s *Death Penalty Seminars***

In this essay I want to focus on Derrida’s treatment of religion as it relates to the death penalty. In a helpful essay on the topic, Michael Naas argues that the last part of Derrida’s life was more or less devoted to uncovering or deconstructing the non-secular or religious underpinnings of pretty much everything in the modern world: hospitality, sovereignty, the death penalty, and so on.[[1]](#footnote-1) I think Naas’ argument is basically right, and I take it for granted. My interest is more narrowly focused on the way Derrida treats biblical texts in the death penalty seminars. My interest in this topic has little to do with trying to make sense of Derrida’s death penalty seminars within Derrida’s larger corpus. Good work on that has already been done by Naas, Matthias Fritsch,[[2]](#footnote-2) and others. Instead, this essay will attempt to make sense of Derrida’s views on religon—and especially Christianity—and the death penalty, followed by an evaluation of those views. My thesis is that Derrida is partly right in his assessment that Christianity appears to be divided against itself on the question of the death penalty.

**Derrida Finds The Death Penalty Clearly Commanded in the Old Tesatment**

First, what does Derrida think the Bible has to say about the death penalty? He interprets familiar Old Testament texts that clearly teach the necessity of the death penalty.[[3]](#footnote-3) He wonders how a God who cherishes human life could command the taking of life for any number of offenses. Premeditated killing, man-stealing, and the dishonoring of parents all deserve and require the judgment of the death penalty. But how is this possible, given that one of the commandments is a prohibition against the taking of human life? Is God inconsistent?

The inconsistency disappears when one examines the use of words in the book of Exodus. Derrida relies on André Chouraqui’s translation of the Old Testament, which avoids “tu ne tueras pas” (thou shalt not kill) in favor of “tu n’assassineras pas” (thou shalt not murder).[[4]](#footnote-4) Deaths that are murders require the death penalty, which is itself not a murder, but a killing. These “two deaths” are heterogeneous to one another, in the same way that theft is heterogeneous to the lawful taking of property of one who has committed a theft.[[5]](#footnote-5) It’s not the fact of death that matters, but the modality of death that makes all the difference.

This distinction between killing and murder—between two kinds of death—has had such an impact that philosophers down through the ages have incorporated it into their political theories. Rousseau, Locke, and Montesquieu all contend that political power includes within it the power to take away life from those who deserve it—who have committed murder, not killing. In Locke’s famous definintion of political power,[[6]](#footnote-6) readers often gloss over the death penalty requirement in their focus on preservation of property as essential to political power—but it is there.

Also noted is the dread the people of Israel have as they anticipate the giving of the death penalty in Exodus 20:18-21.[[7]](#footnote-7) Derrida does not leave a comment here but rather a moment of silence, indicating the gravity of the text. The Israelites—the people of God—are afraid of God. Why? The holiness of God terrifies the Israelites. But Derrida suggests something else as well—that perhaps this event, like the death of Socrates, is an indication that the threat of death is at the origin of the state.[[8]](#footnote-8) Moreover, Derrida suggests that perhaps it is of the very essence of political power, of sovereignty, and of power and sovereignty as theologico-political—that it be wrapped up with the issuance of the death penalty. The death penalty is actually the hyphen in theologico-political, something that is necessarily inscribed within a system called the theologico-political.[[9]](#footnote-9)

What could Derrida mean by this? Let me offer one suggestion. God (theos) is the only one who has the right to give and take away life. He has made all things, and he can take away all things. As the chief sovereign, only he has the right and power to do that. That is the essence of sovereignty, as it were. But God also decided to give political power to human beings—and in so doing, gave them sovereignty, including the power to take away human life. If we think theologico-political, then, we must think the death penalty. Implied by Derrida is that if we somehow strip away “theological” from theologico-political, then perhaps we do not need to think the death penalty anymore. This, of course, is a very difficult thing to do in the West when the theological and the political are so tied together, and when any thinking of sovereignty is inevitably tied up with divine sovereignty.

Finally, Derrida also focuses on the talionic law (eye for an eye) found in the Old Testament, specifically the Torah. Deuteronomy 19:21, Leviticus 24:15-22, and Exodus 21:23-25 all contain versions of the talionic law. Derrida observes that within the Deuteronomy passage that it is not just the law of retribution at work, but also deterrent exemplarity: yes, a life for a life, but also to incite fear in the people of God so that they will not disobey God. Derrida connects this tradition to the talionic emphases in Immanuel Kant, who argues for the death penalty on talionic grounds, but without an appeal to Scripture or to deterrent exemplarity. The power of the talionic lies in the justice it attempts to uphold.

**Derrida Notes a Tension Within Christianity on the Death Penalty**

Derrida does more than recount and interpret familiar biblical passages that speak about the death penalty. In typical Derrida fashion, he pits Christianity against itself on the question of the death penalty. It is not so much Christianity against atheism—as Albert Camus would have it—but rather two different interpretations of Christianity, of the Gospels, and of the Passion.[[10]](#footnote-10) On the one side is the abolitionism of Victor Hugo. Hugo’s position is clear: “It is in the name of God and of a Christian God that the death penalty is going to be opposed.”[[11]](#footnote-11) Put another way, “[i]t is in the name of a certain evangelical Christianity that the death penalty is condemned, a death penalty whose history is also linked, in the West, to the history of Christianity and the Christian church.”[[12]](#footnote-12) The reason Hugo can provide a Christian denunciation of the death penalty is because of Christ’s words, “I am the life and the truth.”[[13]](#footnote-13) Human life is inviolable. It can never be violated, taken away, abrogated—for any reason whatsoever. It’s an assertion of divine law above human law. More than that, the death penalty is the ultimate attempt to do what only God can do. Only God has the right to take away life.[[14]](#footnote-14)

The contrast is also made between the talionic laws from the Old Testament passages and the apparent overcoming of those laws in the New Testament, especially the teachings of Jesus in Matthew 5. Instead of eye for an eye, Jesus calls on his followers to turn the other cheek. Derrida uses Reik and Freud to re-interpret this passage, however. This teaching is not an overcoming of the talionic law, but a restatement of it. The truth is that when one of us is struck on the cheek, our desire is to strike back twice. We therefore sublimate that desire and respond by turning the other cheek and asking for two strikes instead of one. We walk two miles instead of one.[[15]](#footnote-15) Vengeance is masked by forgiveness Regardless, the teachings mark a moving beyond the talionic law of the Torah, whether you believe the talionic is sublimated or not.

We see this overcoming theme in Hugo. The evils committed by human beings cannot go unpunished. There must be expiation for any crime, and certainly for the most heinous crimes committed by human beings against other human beings. If the criminal will not pay with her life, there still must be expiation and repayment. For Hugo, that repayment and expiation comes through substitution of a “cross for the gallows.”[[16]](#footnote-16) But it’s not just a substitution; it’s also an overcoming. The “gentle law of Christ” must overcome Hebraic texts and Roman laws. Hugo saw Christian civilization coming into its own in France and in Europe.[[17]](#footnote-17) For most of Christian history, a Christendom that promoted the death penalty had reigned. This Christendom was opposed to Christ, had kept him buried in the tomb. But the logic of Christianity is progressing toward an abolition of the death penalty—Hugo is sure of that.

With all this said, there is another side to the debate. Many churches throughout the centuries have supported the use of the death penalty. Catholic churches in particular have consistently held that “the state has the right of life and death over its citizens.”[[18]](#footnote-18) This point of view is represented well by Catholic thinker Juan Cortés. Cortés argues that the history of redemption centers on the idea and act of the bloody sacrifice. Cain and Abel began this tradition. Abel offers a sacrifice to God, a sacrifice of blood; Cain kills Abel, shedding his blood. This first sacrifice and murder requires a redemption, a redemption only to be found in a spotless lamb, the Redeemer Jesus Christ. Cortés argues that this economy of the need for a bloody sacrifice is incorporated into the state as well. The death penalty is so necessary to the state that its abolition would result and has resulted in lawlessness evidenced by extensive, lawless bloodshed. Bloodshed will occur no matter what; the question is whether it will happen through the lawful death penalty or through lawless violence.[[19]](#footnote-19) The abolition of the death penalty is the abolition of law and of the state. The death penalty is a just punishment for a capital crime. Its abolition is a basic injustice. Abolition of the death penalty is the delegitimization of the entire legal system and promises disorder in society itself.

From the point of view of Christianity, then, there are two basic ways of looking at the death penalty. For Derrida, this is an apparent contradiction: “divine law of abolitionism against divine law of the death penalty.”[[20]](#footnote-20) There is on the one hand a largely Old Testament and Torah-inspired support of the death penalty; on the other hand is a largely New Testament and evangelical desire for the abolition of the death penalty. From Derrida’s point of view, this proves that Christianity is at odds with itself on the question of the death penalty. Is he right?

**Is He Right About Christianity as Being at Odds with Itself?**

It is worth taking a closer look at the Genesis 9 text, a text that Derrida largely ignores. The text says that “whoever sheds the blood of a human, by a human will his blood be shed.” What does this mean? Some biblical scholars like Michael Westmoreland-White and Glen Stassen observe that this is not legislative language, but rather poetic language.[[21]](#footnote-21) Instead of its being a command, it’s actually a prediction, similar to the type of language used in Genesis 3 where God describes and predicts the conflict that will occur between men and women as a result of the fall. It therefore acts as more prediction and description than command. Human beings will respond to violence with violence. This is a fact of life, perhaps a curse—but it is too much to say that it is a command. Moreover, there is no government established to enforce this command, so to infer that this is a command to establish human government with the death penalty as its first responsibility is unwarranted by the text itself.

However, not all scholars agree with this interpretation of Genesis 9. Take, for example, the noteworthy commentator of Genesis, Gerhard von Rad.[[22]](#footnote-22) Von Rad observes that the foundation of the Genesis 9 passage is that human beings are God’s possession. He recognizes the tension in the death penalty command: that human life has an “inviolable holiness” and that human beings are responsible for punishing the crime of premeditated murder with the death penalty.[[23]](#footnote-23) As to the question of whether this is a command or not, Von Rad is clear that it is. Genesis 9 establishes the human community as the “executor of the direct divine will,” as the phrase “by man” suggests. Further, the larger context supports this reading. The Noahic covenant follows the flood of the earth, an act of divine judgment—of killing—against the wickedness of human beings. God then promises to never directly destroy human life like this again, but then gives human beings the responsibility for the protection of God’s image. In other words, God does not desire to directly act upon human beings with the giving and taking away of life—but he has given that task to human beings instead.

Von Rad is not alone in his interpretation of Genesis 9. Jewish writer David Novak contends that Jews who believe in the binding nature of the Old Testament can not be opposed to the death penalty “in principle.”[[24]](#footnote-24) He does not use the Genesis passage in isolation but combines them with the Exodus and Leviticus passages to infer that God requires the death penalty, both for the people of God and all of humanity. A typically Protestant perspective is presented by Gilbert Meilaender, who inteprets Genesis 9 not as a civil or ceremonial prescription but rather as a part of the natural or moral law, a law which traditionally understood proceeds from the eternal law of God and is binding on all human beings insofar as they have the law of God written on their hearts.[[25]](#footnote-25) Meilaender recognizes the paradoxical tension within the death penalty that Derrida and many others note, that in upholding and honoring the image of God left behind in the murdered we simultaneously demean the image of God in the murderer. However, he argues that this is simply a feature of all retributive justice, that a thief who mars the image of God in theft also has her own image marred by spending 30 years in prison. There is no getting around that paradox of retributive justice, whether found in the death penalty or elsewhere in schemes of punishment. J. Budziszewski takes it a step further to claim that anyone who objects to the death penalty on biblical grounds is not interested in the pursuit of justice. As difficult as the death penalty is, failure to implement it as a matter of principle ignores and marginalizes the horror of the deed that justified the death penalty in the first place. For those who want to abolish the death penalty, the interest is not in justice, but rather in mercy. More to the point, a legal system without the death penalty would not be a system of justice, but a system of mercy.[[26]](#footnote-26) Finally, Christian theologian John Carlson assumes that Genesis 9 requires the death penalty and argues that its command is rooted finally in the nature of God. Premeditated murder, the condition for the death penalty in Genesis 9, is ultimately a strike against God himself—since of course human beings are created in the image of God.[[27]](#footnote-27)

While there is some disagreement among biblical scholars and theologians on the meaning and application of Old Testament texts having to do with the death penalty, the differences are amplified when it comes to interpreting and applying New Testament teachings. Take, for example, the teachings of Jesus in the Sermon on the Mount. Westmoreland-White and Stassen acknowledge that Christian retentionists rest their case largely on Matthew 5:17-20: “Do not think that I have come to abolish the law or the prophets; I have come not to abolish but to fulfill. For truly I tell you, until heaven and earth pass away, not one letter, not one stroke of a letter, will pass from the law until it is accomplished.”[[28]](#footnote-28) Retentionists therefore believe that Christ did not come to abolish the death penalty. Westmoreland-White and Stassen argue, however, that this Matthew passage does not tell us all we need to know. Does it mean that Christians should still obey all the Torah, including every ceremonial and civil law? Certainly it could not mean that. This particular passage in Matthew could never tell us which laws from the Torah we should retain; therefore, it cannot tell us that we should or should not retain the death penalty.

More famous and important is the Matthew 5:38-42 passage. Here Jesus calls his listeners and disciples to not respond in retaliation to an act of evil or violence. While the Torah teaches “eye for an eye” or “tooth for a tooth,” Jesus commands his people to go beyond that teaching, avoiding a resistance that would be evil. Turning the other cheek, going a second mile, giving the cloak—all of these are “transforming initiatives” that obligate Christians to avoid retaliation in dealing with people, even enemies. Furthermore, John 7:53-8:11 really undermines death penalty advocates. A woman caught in adultery is brought to Jesus, and knowing that adultery was grounds for execution in the Torah, Jesus was provided with a test. But Jesus responds by saying, “Let the one of you without sin cast the first stone.”[[29]](#footnote-29) Westmoreland-White and Stassen also point to the crucifixion of Christ as a point against death penalty advocates. How could Christians, they argue, support an action that killed their Lord and Savior?

What about Romans 13:1-7, a classic passage on the role of civil government and used by death penalty supporters. Westmoreland-White and Stassen argue that the word “sword” in v. 4 does not refer to execution or the death penalty but rather to the “kind worn by policeman who accompanied tax collectors.”[[30]](#footnote-30) This makes sense given that Paul mentions twice that taxes should be paid to those whom taxes are owed. The gist of the passage on this reading is that Christians should on the whole obey civil government and has nothing to do with capital punishment. If it did, basing an entire theology of capital punishment on the word “sword” is dangerous and probably irresponsible exegesis.

Taken together, the case against the death penalty from the perspective of the New Testament seems rather strong, according to Westmoreland-White and Stassen and others. But is there another side to the interpretation of these passages?

J. Budziszewski makes the case that while it is certainly true that Christ taught forgiveness, he never challenged the system of public justice.[[31]](#footnote-31) His admonitions in Matthew 5, John 7, and in his example in life are all meant to teach and encourage his followers to live lives of self-sacrifice and forgiveness. However, nowhere does he categorically reject the death penalty or question the responsibility of public authority to exercise justice. Jesus’ teachings are for Christians to consider how the law of love should impact their dealings with neighbors and enemies. But to infer from these teachings that the death penalty should be abolished is reading something into the texts that is not there. And while Budziszewski agrees with his opponents that mercy should be sought in individual tough cases, mercy should not be sought categorically—for then that would be an abdication of justice.[[32]](#footnote-32)

More specifically than that, the common retentionist approach in dealing with the Matthew 5 and John 7 passages is to explain them as teachings about individual Christian morality and not public justice. In fact, as Kerby Anderson argues, Jesus actually validates the role of the state in seeking vengeance in Matthew 5, since he is admonishing Christians to “not try to replace the power of the government.”[[33]](#footnote-33) Christians should love their enemies and turn the other cheek, but it is not the responsibility of the government to do so. John 7 can be explained by referring to the context. Jesus was trying to avoid a trap. On the one hand, if he had said they should stone her, he would be advocating the breaking of Roman law. If he had asked to have mercy shown to her, he would be advocating the breaking of Jewish law. As Anderson argues, “since he did teach that a stone be thrown…this is not an abolition of the death penalty.”[[34]](#footnote-34)

Then, what of Romans 13:1-7? Justice Antonin Scalia argues that the teaching of Romans 13, while certainly a command for Christians to obey civil government, is also a statement about civil government’s task.[[35]](#footnote-35) What is that task? It is to exercise justice, to inflict God’s wrath on the wrongdoer. Scalia makes the comment in passing that “sword” clearly refers to the death penalty, but he does not argue for this position. Commentator Grant Osborne supports Scalia’s claim: “While *bear the sword* primarily connotes the death penalty, it also generally describes the duty of the state to punish people who commit crimes in general.”[[36]](#footnote-36) Medieval commentator Peter Abelard also assumes that the “sword” connotes the power to “kill.”[[37]](#footnote-37) In a commentary on the Greek text in particular, Richard Longenecker argues that Romans 13 actually fits well with Matthew 5. Jesus’ admonition in Matthew 5 actually teaches that Christians should not take retribution into their own hands, but rather should leave retribution to the civil government.[[38]](#footnote-38)

**Conclusion**

There are clearly arguments to be made on both sides of the death penalty debate, all of them rooted in interpreting the Old and New Testaments as Scripture, such that Derrida’s argument that Christianity is divided against itself appears to have some merit. It is clearly the case, as I have shown, that biblical commentators and theologians disagree on the meanings and applications of both Old and New Testament texts as they pertain to the death penalty. One honest reader of Genesis 9 sees poetic description while another sees a command for all time. One interpreter of Romans 13 finds “sword” referring to a tax collector while another finds the death penalty embedded within it. Some find Jesus’ teaching as an overcoming of Torah’s talionic law; others see it as a confirmation of the talionic. And on and on.

It is at this point that I would go beyond Derrida. I think it is fair to say that one body of interpretation is that the New Testament teaching is different from the teaching of the Torah on the question of the death penalty. It is perfectly reasonable to believe that the Old Testament teaches the need for the death penalty but that Christ calls people to go beyond and against it. If this is Christianity divided against itself, or two Christianities as Derrida would put it, then so be it. However, I would also say that there are also whole bodies of interpretation that are pitted against each other. There appears to be one school that believes the Bible consistently teaches the necessity of the death penalty from Genesis 9 to Matthew 5 to Romans 13. There also appears to be a school that believes the death penalty is not taught at all as a legal requirement. And then there appears to be a school that believes there is a discontinuity between Old and New Testaments on the question of the death penalty. But that there are different schools of interpretation does not imply that there are multiple Christianities, only that there are multiple ways of interpreting the Bible on the death penalty.

The purpose of this paper was not to resolve the longstanding dispute between Christians on the issue of the death penalty. It was also not to suggest that because there is disagreement on what the Bible teaches about the death penalty that there is not a single teaching. Many doctrinal disputes come to be resolved in time, and mere disagreement does not logically imply that there is not a single teaching on the subject. It was also not meant to be a paper about the vexing question of the practical implementation of the death penalty, including issues like cruelty, innocent people being to death, and the like. There are many issues still to be discussed even if someone supports the death penalty on biblical grounds. Those can be left for another time.

**Bibliography**

Abelard, Peter. *Commentary on the Epistle ot the Romans*. Washington, DC: The Catholic University of America Press, 2011.

Derrida, Jacques. *The Death Penalty: Volume I*. Chicago: The University of Chicago Press, 2013.

Derrida, Jacques. *The Death Penalty: Volume II*. Chicago: The University of Chicago Press, 2017.

Fritsch, Matthias. “Derrida On The Death Penalty.” *The Southern Journal of Philosophy* 9, no. 1 (2012): 56-73.

Henningfield, Diane Andrews. *The Death Penalty: Opposing Viewpoints*. Farmington Hills, MI: Greenhaven Press, 2006.

Locke, John. *Second Treatise of Government*. Barnes and Noble Publishing, 2014.

Longenecker, Richard. *The Epistle to the Romans: A Commentary on the Greek Text*. Grand Rapids, MI: 2016.

Naas, Michael. “The Philosophy and Literature of the Death Penalty: Two Sides of the Same Sovereign.” *The Southern Journal of Philosophy* 9, no. 1 (2012): 39-55.

Osborne, Grant. *Romans*. Downers Grove, IL: Intervarsity Press, 2010.

Owens, Erik, John Carlson, and Eric Elshtain. *Religion and the Death Penalty: A Call for Reckoning*. Grand Rapids, MI: Eerdmans Publishing Co., 2004.

Von Rad, Gerhard. *Genesis: A Commentary, Revised Edition*, trans. John H. Marks. Philadelphia, PA: The Westminster Press, 1972.

1. Naas, Michael. “The Philosophy and Literature of the Death Penalty: Two Sides of the Same Sovereign.” *The Southern Journal of Philosophy* 50, no. 1 (2012): 39-55. [↑](#footnote-ref-1)
2. Fritsch, Matthias. “Derrida On The Death Penalty.” *The Southern Journal of Philosophy* 50, no. 1 (2012): 56-73. [↑](#footnote-ref-2)
3. Jacques Derrida. *The Death Penalty: Volume I*, trans. Peggy Kamuf (Chicago: The University of Chicago Press, 2013), 12. [↑](#footnote-ref-3)
4. Ibid., 13. [↑](#footnote-ref-4)
5. Ibid., 14. [↑](#footnote-ref-5)
6. John Locke, *Second Treatise of Government* (Barnes and Noble Publishing, 2014), 3. [↑](#footnote-ref-6)
7. Jacques Derrida, *The Death Penalty: Volume I*, trans. Peggy Kamuf (Chicago: The University of Chicago Press, 2013), 19. [↑](#footnote-ref-7)
8. Ibid. [↑](#footnote-ref-8)
9. Ibid., 23. [↑](#footnote-ref-9)
10. Ibid., 75. [↑](#footnote-ref-10)
11. Ibid., 105. [↑](#footnote-ref-11)
12. Ibid., 129. [↑](#footnote-ref-12)
13. Ibid., 104. [↑](#footnote-ref-13)
14. Ibid., 122. [↑](#footnote-ref-14)
15. Jacques Derrida, *The Death Penalty: Volume II*, trans. Peggy Kamuf (Chicago: The University of Chicago Press, 2017), 173. [↑](#footnote-ref-15)
16. *The Death Penalty: Volume I*, 201. [↑](#footnote-ref-16)
17. Ibid., 204. [↑](#footnote-ref-17)
18. Ibid., 181-182. [↑](#footnote-ref-18)
19. *The Death Penalty: Volume II*, 263. [↑](#footnote-ref-19)
20. *The Death Penalty: Volume I*, 182. [↑](#footnote-ref-20)
21. Michael Westmoreland-White and Glen Stassen, "Biblical Perspectives on the Death Penalty," in *Religion and the Death Penalty: A Call for Reckoning,*eds. Erik Owens, John Carlson, and Eric Elshtain (Grand Rapids, MI: Eerdmans Publishing Co., 2004), 126. [↑](#footnote-ref-21)
22. Gerhard von Rad, *Genesis: A Commentary, Revised Edition*, trans. John H. Marks (Philadelphia, PA: The Westminster Press, 1972), 132-133. [↑](#footnote-ref-22)
23. Von Rad, 133. [↑](#footnote-ref-23)
24. David Novak, “Can Capital Punishment Ever Be Justified in the Jewish Tradition?” in *Religion and the Death Penalty*, 35. [↑](#footnote-ref-24)
25. Gilbert Meilaender, “The Death Penalty: A Protestant Perspective,” in *Religion and the Death Penalty*, 50. [↑](#footnote-ref-25)
26. J. Budziszewski, “Categorical Pardon: On the Argument for Abolishing Capital Punishment,” in *Religion and the Death Penalty*, 110. [↑](#footnote-ref-26)
27. John Carlson, “Human Nature, Limited Justice, and the Irony of Capital Punishment,” in *Religion and the Death Penalty*, 163. [↑](#footnote-ref-27)
28. Westmoreland-White and Stassen, 131. [↑](#footnote-ref-28)
29. Ibid., 135. [↑](#footnote-ref-29)
30. Ibid., 137. [↑](#footnote-ref-30)
31. Budziszewski, 120-121. [↑](#footnote-ref-31)
32. Budziszewski, 122. [↑](#footnote-ref-32)
33. Kerby Anderson, “The Death Penalty Is Consistent With Religious Ethics,” in *The Death Penalty: Opposing Viewpoints*, ed. Diane Andrews Henningfield (Farmington Hills, MI: Greenhaven Press, 2006), 64. [↑](#footnote-ref-33)
34. Ibid., 65. [↑](#footnote-ref-34)
35. Antonin Scalia, “God’s Justice and Ours: The Morality of Judicial Participation in the Death Penalty,” in *Religion and the Death Penalty*, 234-235. [↑](#footnote-ref-35)
36. Grant Osborne, *Romans* (Downers Grove, IL: Intervarsity Press, 2010), 345. [↑](#footnote-ref-36)
37. Peter Abelard, *Commentary on the Epistle to the Romans*, (Washington, DC: The Catholic University of America Press, 2011), 345. [↑](#footnote-ref-37)
38. Richard Longenecker, *The Epistle to the Romans: A Commentary on the Greek Text* (Grand Rapids, MI: Eerdmans Press, 2016). [↑](#footnote-ref-38)