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A New Hope? Pope Francis, the Academy, and LGBT Scholars and Scholarship

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Abstract

For many years now, scholars of religion and/or sexuality at Catholic colleges and universities have had their academic freedom challenged by the orthodoxy of the church—especially for LGBT scholars, or works of scholarship that promote LGBT lives. However, with the rise of Pope Francis a new hope of academic freedom appears. In the pontiff's apostolic exhortation *Evangelii Gaudium*, Pope Francis calls for church officials to engage the academy in dialogue, not with rote condemnation. This call for dialogue may be a new hope for scholars of religion and/or sexuality—especially LGBT scholarship—at the intersection of Catholic identity and academic freedom.

Introduction

In 2012, at an AAUP conference, I presented a paper titled "Objects of the Inquisition—The Trials of Religion Scholars at Catholic Institutions Who Engage with Sexuality Studies." The paper would find itself, by the same name, in the January–February 2014 issue of *Academe*. In that paper, and the subsequent article, I expressed concern about the juridical approach by which the United States Conference of Catholic Bishops was applying the Vatican document *Ex corde ecclesiae* in relation to scholarship that dared to challenge the church's teachings on theology or sexual ethics. The author of *Ex corde ecclesiae* was none other than Pope John Paul II, who "sought to clarify the relationship between the Catholic Church and colleges and universities with Catholic identities."¹ In the document, John Paul II "affirmed the pursuit of truth through

academic freedom," however he also "situated the intellectual pursuit of truth within the context of commitments to religious truth and the hierarchical church body as the guardian of that truth."² John Paul II wrote,

Every Catholic University, as a university, is an academic community which, in a rigorous and critical fashion, assists in the protection and advancement of human dignity and of a cultural heritage through research, teaching and various services offered to the local, national, and international communities. It possesses that institutional autonomy necessary to perform its functions effectively and guarantees its members academic freedom, so long as the rights of the individual person and the community are preserved within the confines of the truth and the common good.³

But, as I asked at the conference in 2012 and in the *Academe* article as well, that last line from John Paul II "raises a serious question: who gets to define 'truth' and 'the common good?'"⁴

The question would be purely academic if it weren't for the interventionist application of *Ex corde ecclesiae*—including its most recent reapplication, in 2011, under Pope Benedict XVI. Among the targeted have been Todd Salzman and Michael Lawler (of Creighton University), for offering a revisionist account of natural law teaching about human sexuality in their book *The Sexual Person: Toward a Renewed Catholic Anthropology*. The United States Conference of Catholic Bishops turned to Creighton University to discipline these scholars, but thankfully the administration defended their academic freedom. Jodi O'Brien did not fare as well. O'Brien was offered a post, which was soon after rescinded, at Marquette University because her published works in gender, sexuality, marriage, and family raised too many concerns for Milwaukee's archbishop, Jerome Listecki. Other targets have included Laine Tadlock, who was removed from her program director position at Benedictine University, all for publishing her same-sex wedding announcement in the Springfield, Illinois, *State Journal Register*. Sister Margaret Farley's book *Just Love* was publicly condemned via the United States Conference of Catholic Bishops because she argued for the virtue of justice in sexual relationships, even nonmarital or nonheterosexual ones. Sister Elizabeth Johnson of Fordham University was also publicly denounced—without any consultation or dialogue—by the United States Conference of Catholic Bishops for her works in theology.⁵

While these cases have been made public, I have suggested that they are but a few examples of what may very well be happening at other Catholic colleges and universities—with a peculiar emphasis on scholars of religion and sexuality or, really, any work of scholarship that explores these fields. For example, three years ago at my own university, I was asked whether I would publicly disassociate myself *anytime* I offered public

lectures on my constructive arguments in sexual ethics that affirm lesbian, gay, bisexual, transgender, and nonmarital sexual relationships. The request came from the local bishop's office. It was a request that came midway through my tenure-track position as assistant professor of religious studies—when I had neither the benefits of tenure nor the rank to potentially protect my post. I declined the bishop's request, arguing that the terms "Catholic" and "university" are mutually informing. While I fully embrace (then and now) the university values articulated by the Sisters of Mercy who founded our school, closeting my academic work seemed, to me, to negate the mission of the institution as a *university*. My department, deans, and administration supported my decision, and (thankfully) we did not hear from that bishop again. Looking back, the positive outcome of advancing academic freedom was a very good one. But the time of being "singled out" and of "strategizing a response" was difficult. Nevertheless, taking a stand is what I have publicly advocated in the face of the interventionist application of *Ex corde ecclesiae*—especially for scholars of sexuality and religion, and even more so when those scholars publicly identify among the variety of identities that reveal sexual and gender diversities. In fact, through the article I published in *Academe*, I said to my colleagues, as well as to any church official (maybe) paying attention:

Scholars of religion and sexuality who are working in Catholic colleges and universities need to get ahead of the problem. "Getting ahead," however, means getting prepared, not falling back. When one is a scholar of religion and sexuality—something surely not concealed at hiring—engaging with one's field does not amount to thumbing one's nose at ecclesiastical authority, nor does it involve showing disrespect to the founding religious principles of the institution. Rather, the analyses of the scholar of religion and sexuality provide much-needed content for ongoing discourse—even if that content represents a challenge to particular reigning moral or theological norms. Without such discourse, the university will become a place of monologue and indoctrination. Church efforts to stamp out such discourse are a form of inquisition dressed in the modern language of the pursuit of knowledge for the sake of "truth and the common good." The Inquisition didn't work well for Galileo or for the advancement of knowledge in the seventeenth century; it doesn't work for Catholic scholars, universities, or the advancement of knowledge now.⁶

I published those words with a zeal for academic freedom, and did so as a push against what I thought to be an inappropriate overreaching of Pope Benedict XVI (as well as the United States Conference of Catholic Bishops) into academia.

But then Pope Francis happened.

Pope Francis is both loved and feared for his dialogical and pastoral approach to the application of church teaching. For example, when we look at his public statements on matters of human sexuality, we find a pontiff who appears to be more generous than what his (still living) predecessor ever articulated. Indeed, Pope Francis is now famously known for his comment "Who am I to judge?" in reference to the lives of gay people (priests in particular). What is more, there is some evidence that Pope Francis has favored the embrace of civil unions as a way for the Catholic Church to help gay and lesbian couples receive financial and legal benefits that are so often necessary for the basic participation in global societies. Of course, none of this means that Pope Francis eschews church teaching; nor that the Roman Catholic Church will suddenly change course from its long-held procreative and marital norms in relation to its moral theology of sex and sexuality. However, the leadership of Francis suggests a change of both tone and mediation of conflict. As I mention in my follow-up blog post to the *Academe* article, "Whereas Benedict was willing to thin out the church with the ruler of orthodoxy in order to find its 'true' core . . . Francis appears to be a leader who is willing to front the 'spirit of the law' in order to create relationships and dialogue both in and outside of the church."⁷

The hope that Francis appears to be a leader who is willing to create dialogue "outside of the church," is why I have titled this paper "A New Hope? Pope Francis, the Academy, and LGBT Scholars and Scholarship." I believe that when we turn to Pope Francis's most recent apostolic exhortation, *Evangelii Gaudium*, we find formal teachings from the new pontiff that can serve as resources for advancing academic freedom for all who engage in scholarship—but especially for those who engage in religion and sexuality scholarship, with a particular emphasis on the often-condemned LGBT scholar or works of scholarship. What I offer for the remainder of this paper, then, is substance for strategy—recognizing that the fresh winds of Pope Francis may not have yet made their way through many of our academic institutions that call themselves "Catholic."

***Evangelii Gaudium* as a Resource for Academic Freedom**

When we turn to *Evangelii Gaudium*—or in English, "The Joy of the Gospel"—we find that this apostolic exhortation seeks to reignite evangelism throughout the Roman Catholic Church. On the face of it, this might seem like a strange document from which to mine resources for promoting academic freedom. But for all of its theological assertions that the Roman Catholic Church is yet the guardian of truths both theological and moral, *Evangelii Gaudium* has been written by Pope Francis with at least three streams of thought that I think can be helpful for advancing academic freedom in the context of navigating institutional relationships between a Catholic-identified college or university and the hierarchical body of the church itself. First, we find

in this apostolic exhortation the admission that the church hierarchy needs to be in dialogue with other voices, including those who disagree with church teaching. Second, we find the admission that the church benefits from dialogue with academic disciplines. Third is the admission that the church does not have a monopoly on all truth.

Dialogue

Francis's preference for dialogue over a top-down monologue is often demonstrated throughout this exhortation. He emphasizes it both within and outside the church. In reference to dialogue within the church, for example, Francis teaches that "the bishop . . . will have to encourage and develop the means of participation [in the church] proposed in the Code of Canon Law, and other forms of pastoral dialogue, out of a desire to listen to everyone and not simply to those who would tell him what he would like to hear."⁸ Francis later says, "Today more than ever we need men and women who, on the basis of their experience of accompanying others, are familiar with the processes which call for prudence, understanding, [and] patience. . . We need to practice the art of listening, which is more than simply hearing."⁹ When Pope Francis writes about the need for dialogue *outside the church*, his references to dialogue with academic disciplines are frequent.

Dialogue with Academic Disciplines

For example, Francis writes: "The Church . . . needs to grow in her interpretation of the revealed word and in her understanding of the truth. It is the task of exegetes and theologians to help 'the judgment of the Church to mature.' The other sciences also help to accomplish this, each in its own way. With reference to the social sciences, for example, John Paul II said that the Church values their research, which helps [the church] 'to derive concrete indications helpful for her magisterial mission.'" Francis goes on to say, "Differing currents of thought in philosophy, theology, and pastoral practice, if open to being reconciled by the Spirit in respect and love, can enable the Church to grow, since all of them help to express more clearly the immense riches of God's word. For those who long for a monolithic body of doctrine guarded by all and leaving no room for nuance, this might appear as undesirable and leading to confusion. But in fact such variety serves to bring out and develop different facets of the inexhaustible riches of the Gospel."¹⁰

For those who are familiar with Roman Catholic lingo, Pope Francis has said something quite interesting here. Namely, often times when academics teach theories or construct arguments that challenge the doctrine of the Catholic Church, the scholar can be charged with "confusing the faithful." Notice, again, then, Francis's words that those who want a "monolithic body of doctrine guarded by all and leaving no room for

nuance" are, in fact, wrong-headed. Francis admits that there are "differing currents of thought" in academic disciplines (differing in relation to Catholic doctrine), which traditionalists fear will lead to confusion, but which the pontiff actually thinks are resources for engaging in even more meaningful explanation of that doctrine. For Francis, competing claims are not to be feared, they are to be engaged in respectful dialogue that allows for academics to make their arguments but also space for the church to respond—and all through a dialogical relationship.

That said, Pope Francis's dialogical method is not simply a methodology for cultivating the intellect or the academy. Without question, all these statements are explicitly a part of his call for a reinvigorated evangelical effort in the Roman Catholic Church, namely an effort to proclaim the church's interpretation of the gospel in words and works—and largely in reference to eschatological concerns about the destiny of human souls. Such soteriological concerns include an evangelical eye toward academics. Francis says, "Proclaiming the Gospel message to different cultures also involves proclaiming it to professional, scientific, and academic circles."¹¹ But even if Pope Francis is interested in evangelizing us, his dialogical approach appears sincere. He writes, "The Church, in her commitment to evangelization, appreciates and encourages the charism of theologians and their scholarly efforts to advance dialogue with the world of cultures and sciences."¹²

Even if we do not share the religious framework or specific theological concerns of the Roman Catholic Church, it is possible, I think, for the academic to appreciate what Pope Francis is seeking to accomplish with this unique evangelical program. In particular, instead of casting the insights of academia as a threat to Roman Catholic teaching, the pontiff is directing church leaders to accept that understanding diverse academic perspectives, and engaging in substantive conversation with scholars, is a far better approach to evangelization than top-down, authoritative condemnations or threats. I think that we who research and teach at Catholic colleges and universities can bracket the evangelical concern and appreciate the effort of Francis to engage in discourse with us—which I take to be a central pillar of our work in academia: to promote discourse and debate among diverse bodies with diverse perspectives. This is a matter of agreement between Pope Francis and the academy that I think should be appreciated and leveraged.

No Monopoly on Truth

I also contend that many academics will likely relate to a sentiment that Pope Francis holds: that we must be willing to pursue 'truth' with the humility to admit when our perspectives turn out to be unreliable, as well as the wisdom and prudence to invest our claims of truth with nuance. In other words, we must be willing to

admit that there is no monopoly on truth. Here, Pope Francis must walk a delicate line. On the one hand, the Roman Catholic Church heralds itself as the guardian of all immutable truths of God—in terms of both religion and morality. On the other hand, Pope Francis admits in *Evangelii Gaudium* that "the Church's teachings concerning contingent situations are subject to new and further developments and can be open to discussion."¹³ Indeed, Francis goes on to say, "The Church's pastors, taking into account the contributions of the different sciences, have the right to offer opinions on all that affects people's lives, since the task of evangelization implies and demands the integral promotion of each human being."¹⁴ Francis even admits, "Furthermore, neither the Pope nor the Church have a monopoly on the interpretation of social realities or the proposals of solutions to contemporary problems."¹⁵

As I interpret Francis on this point, I read him as directing church officials to be open to the insights of the academy, especially as nation states (if not the entire global community) investigate what it means for human beings to be free and to live and do well. Francis admits, "Faith is not fearful of reason; on the contrary, it seeks and trusts reason, since 'the light of reason and the light of faith both come from God and cannot contradict each other. . . . All of society can be enriched thanks to this dialogue [between faith and reason], which opens up new horizons for thought and expands the possibilities of reason. This too is a path of harmony and peace."¹⁶

Francis qualifies this sentiment with only an appeal to theology as a reliable source of illumination and a statement that Catholics should understand the pursuit of truth as something that includes both Catholic dogma *and* rational inquiry. He says,

“The Church has no wish to hold back the marvelous progress of science. . . . Whenever the sciences—rigorously focused on their specific field of inquiry—arrive at a conclusion which reason cannot refute, faith does not contradict it.”¹⁷

But, Francis says,

neither can believers claim that a scientific opinion which is attractive but not sufficiently verified has the same weight as a dogma of faith. At times some scientists have exceeded the limits of their scientific competence by making certain statements or claims. But here the problem is not with reason itself, but with the promotion of a particular ideology which blocks the path to authentic, serene and productive dialogue.¹⁸

In other words, Pope Francis retains the authority of dogma—*however*, he does so without insisting on an inquisitional application of it.

Applying *Evangelii Gaudium* Principles to Academic Freedom/LGBT Scholars and Scholarship

The relevance of *Evangelii Gaudium* for the promotion of academic freedom at Catholic colleges and universities is significant. I broadly apply it to Catholic colleges and universities for institutional best practices. I more specifically apply it to scholars who engage in religion and sexualities studies; and, as a matter of special concern, I apply it to lesbian, gay, bisexual, or transgender scholars, or works of scholarship, advancing LGBT liberties—all of whom have often been targets of the juridical and inquisitorial approach of the application of *Ex corde ecclesiae*.

First, we can consider the benefit of *Evangelii Gaudium* for the promotion of academic freedom at Catholic colleges and universities as a matter of institutional best practices. While I do not benefit from serving as an administrator, anecdotal inferences (across a number of American Catholic schools) suggest to me that many administrators at Catholic colleges and universities are sometimes at a genuine loss when negotiating and navigating the relationship between the academic institution and the church hierarchy, especially around issues of academic freedom or policies germane to twenty-first century higher education institutions consisting of diverse populations and needs. Admittedly, *Ex corde ecclesiae* calls for a relationship between the local bishop and the administration of the local Catholic college or university. But it is not altogether clear that the relationship has been conceived of, or practiced, in mutuality or with a healthy sense of boundaries. While it is true that some Catholic academic institutions have willfully abdicated the church-school relationship, it is also true that some bishops (with all sorts of passive-aggressive public postures, as well as subtle and explicit threats to the institution) have demanded that Catholic colleges and universities adhere (albeit selectively) to doctrine at the expense of academic freedom. For example, I have yet to find evidence that a bishop has intervened in a college or university that promotes public lectures or scholarship on conservative economic policies (which, in truth, violate Catholic social teaching on the preferential treatment of the poor), but as I discussed at the beginning of this paper, I can find many examples of public lectures or scholarship on sexuality eliciting the intervention of not only one local bishop but also an entire council of bishops. As a result, and all too often, the church has privileged its doctrinal anxieties about pelvic issues (and disproportionately in relation to all of the church's other teachings), and it has done so through the practice of unilateral critique and condemnation of schools and scholars. *Evangelii Gaudium*, however, gives Catholic college and university administrators a resource for responding in a way that promotes the productive dialogue that Pope Francis has articulated.

Namely, *Evangelii Gaudium* allows the Catholic college or university administration to accept and defer to the moral and religious authority of the bishops as a matter of respecting church teaching. However, the

principles of *Evangelii Gaudium* call upon both the academic institution and the local bishop to be in a relational state of dialogue. The text of *Evangelii Gaudium* provides the college or university administration language and directives from the primary-source material—from the pontiff himself—to bid the bishop to approach controversial scholarship through an invitation to dialogue with scholars, without first deferring to tones of condemnation. Imagine, for example, that instead of condemning Todd Salzman’s and Michael Lawler’s revisionist natural law book on sexual ethics, the United States Conference of Catholic Bishops and the university organized a symposium that allowed for the exchange of ideas, mutual critique, and proposals for further dialogue. While it would be naive to suggest that symposia will heal all wounds from the conflicts between the church and the academy, and it would also be naive to believe that all bishops will respond to Francis’s call for dialogue between the church and the academy—Catholic colleges and universities can lead with Pope Francis’s dialogical disposition as a matter of fostering better relationships with the church, while also firmly defending academic freedom.

Second, *Evangelii Gaudium* has profound implications for scholarship in sexuality and religion. Recall that the pontiff admits that the church has no interest in holding back the progress of reason—but only declares that if new proposals from rational inquiry reflect untested hypotheses, or unverified theories, then the academic should not be surprised that the church will weight dogma as a reliable source until sufficient evidence is advanced to amend, or rearticulate, the church’s rulings. Sexuality studies and religious studies are academic disciplines that investigate their subjects with methods and theories that are rooted in the natural and social sciences, as well as critical insights from the humanities. When sexuality studies and religious studies intersect, they result in a multidisciplinary approach to rational inquiry, which can be just as rigorous a form of research as any other academic field. If we apply Pope Francis’s comments to the rational inquiries of religion and sexuality studies, then *Evangelii Gaudium* can be read as an invitation for the bishops—at the very least—to approach rational inquiries into religion and sexuality with the kind of professional respect such scholars and studies deserve, as well as careful consideration of arguments and conclusions found in such works of scholarship. Indeed, what I think Pope Francis is pointing toward, and which academics could help foster, is the matter of *mutual respect*. The academic and the bishop need not agree on moral or religious principles in order to engage in civil discourse and debate with each other. The reality, however, is that the perception of ecclesiastical monologue has led many academics to distrust, or dismiss, official church leaders as dialogical partners. It seems to me that we could do better by engaging the bishops of the Catholic Church in the spirit of dialogue—and to do so by initiating the dialogue in the language that *Evangelii Gaudium* provides us. It may be that the invitation to dialogue is ignored, but if it is, no one can fault us for attempting to create the kind of relationship with the church that its highest officer has recommended.

Finally, I apply Francis's apostolic exhortation to the treatment of LGBT scholars, as well as works of scholarship that advance LGBT liberties. Of all the social and moral issues that the Roman Catholic Church addresses in the Euro-American West, homosexuality has been named by the United States Conference of Catholic Bishops as one of the most important issues the church must confront.¹⁹ As a result, those who identify as lesbian, gay, bisexual, or transgender (LGBT) cannot merely exist as individuals who manifest gender and sexual diversities. Such people are regarded by many church officials as people who are prone—in the theological language of the church—to "intrinsic moral evil." What is more, scholarship that promotes LGBT liberties is likewise condemned as contrary to Catholic teaching, contrary to nature, contrary to the social good. Thus, such works are regarded not only as "confusing the faithful" but also as morally and spiritually detrimental.

But such a suspicious view of LGBT people and works of LGBT scholarship can be challenged by *Evangelii Gaudium*. The very classification of LGBT categories and identities is rooted in the natural and social sciences, as well as the humanities. Indeed, the Catholic Church has benefited from the academy on the matter of sexuality and gender. As the religious ethicist Mark Jordan has noted, the Catholic Church no longer brands people with the Medieval category of "Sodomite" on the basis of nonprocreative sexual activities. Rather, the Catholic Church now draws on the language of the academy to describe—explicitly in the *Catechism* itself—"gay and lesbian persons," and even recognizes the innateness of "homosexual orientation."²⁰ This is not language the church draws from its storehouses of theological wisdom; it is borrowed from our academic studies in sexuality. In other words, the church has already amended its view of sexuality on the basis of the work of our academic colleagues. Dialogue with the Catholic Church on the matter of gender and sexual diversities must draw attention to this change in church teaching as a doorway to more fruitful dialogue with the church on the social and moral status of same-sex activities. While church teachers may front the official moral dogma on homosexual orientation as "a disposition ordered toward intrinsic moral evil," and same-sex activity as "gravely disordered and contrary to nature," we must ask—in the spirit of *Evangelii Gaudium*—that this dogma be put in a dialogical relationship with the social and natural sciences, as well as with works in the humanities (especially ethics), that demonstrate how homosexual orientation and same-sex activities can—by the light of prudence—contribute to human flourishing, especially in the Aristotelian sense of living and doing well. For example, we can show that basic criteria of justice (like do no harm, mutuality, equality, boundaries, and accountability) can manifest just as demonstrably in same-sex relationships as in heterosexual ones. We can also show that the absence of reproductive possibility in same-sex genital activities does not in any way detract from the promotion of those strengths of character constituent in the pursuit of important social-moral matters, such as relational intimacy; love; or

social, sexual, and emotional maturation. Indeed, it seems plainly inconsistent that the church has been willing to adopt academic descriptions of "gay and lesbian persons" and conceptions of diverse "sexual orientations," but then ceases at those academic insights in order to staunchly rehearse the moral dogma of the church on sexual ethics. Unfortunately this gives the church the appearance of willfully ignoring (or dismissing) all of the academy's other insights about gender and sexual diversities. Worse yet, when church officials seek to silence, condemn, or penalize those scholars and theologians who disagree with them on this point, the ugly specter of inquisition not only displaces—if not eradicates—academic freedom at Catholic colleges and universities, but it also closes any hope of dialogue in the church about these issues.

Conclusion

To resist this inquisition, I suggest drawing on the new language of the church that Pope Francis has provided us in *Evangelii Gaudium*. In this sense, Pope Francis may indeed be a "new hope" for those who have literally suffered under the juridical and monolithic monologue of church dogma. To be clear, however, I do not think that even Pope Francis will agree with the conclusions of certain works of scholarship in sexuality, religion, and LGBT studies, which, I argue, should be protected under academic freedom. But if the pope is sincere in his call for genuine dialogue, then that very dialogical method may be the source of salvation for our academic freedom at Catholic colleges and universities. If in dialogue we are permitted the freedom to pursue our areas of research without threat of penalty, then any disagreement we encounter from the church about our conclusions will no longer come with the fear of discipline (e.g., silencing or employment termination). Protected by the kind of robust dialogue Pope Francis seems to be advocating is something that actually frees us to live in the kind of principled tension that we academics are accustomed to in peer review and mutual critique—which, if the bishops would agree to it, would amount to an ongoing dialogue among official church teachers, scholars, and the conclusions we reach in our academic work.

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Notes

¹. Richard W. McCarty, "Objects of the Inquisition," *Academe* 100, no. 1 (January-February, 2014): 25.

². *Ibid.*

- ³. John Paul II, *Ex corde ecclesiae* (apostolic constitution, August 15, 1990).
- ⁴. McCarty, "Objects of the Inquisition," 26.
- ⁵. *Ibid.*, 27–29.
- ⁶. *Ibid.*, 29.
- ⁷. Richard W. McCarty, "More About 'Objects of the Inquisition,'" *The Academe Blog*, January 17, 2014, <http://academeblog.org/2014/01/17/more-about-objects-of-the-inquisition/>.
- ⁸. Pope Francis, *Evangelii Gaudium* (apostolic exhortation, November 26, 2013), sec. 1.II.31.
- ⁹. *Ibid.*, sec. 3.IV.171.
- ¹⁰. *Ibid.*, sec. 1.IV.40.
- ¹¹. *Ibid.*, sec. 3.I.132.
- ¹². *Ibid.*, sec. 3.1.133.
- ¹³. *Ibid.*, sec. 4.I.182.
- ¹⁴. *Ibid.*, sec. 4.I.182.
- ¹⁵. *Ibid.*, sec. 4.I.184.
- ¹⁶. *Ibid.*, sec. 4.IV.242.
- ¹⁷. *Ibid.*, sec. 4.IV.243.
- ¹⁸. *Ibid.*, sec. 4.IV.243.
- ¹⁹. Vatican Congregation for the Doctrine of the Faith, *Doctrinal Assessment of the Leadership Conference of Women Religious* (April 18, 2012), http://www.usccb.org/upload/Doctrinal_Assessment_Leadership_Conference_Women_Religious.pdf.
- ²⁰. "The Sixth Commandment: You Shall Not Commit Adultery," *Catechism of the Catholic Church* (Paragraphs 2357–2359, 1994).