

May 1994

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Recommended Citation

Howard, Joseph C. (1994) "The Contemporary Crisis of Abortion, Homosexuality, and Euthanasia: Relations Between Church and State," *The Linacre Quarterly*: Vol. 61: No. 2, Article 5.

Available at: <http://epublications.marquette.edu/lnq/vol61/iss2/5>

The Contemporary Crisis of Abortion, Homosexuality, and Euthanasia: Relations Between Church and State

by

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For centuries, the term Christendom denoted the fact that two sets of powers, the Church and the State, were so united that there were not always clear divisions between these two institutions exercising their powers. History reveals a constant struggle demonstrating each of these two powers attempting to control the other. It is critical to examine the ideal relationship between these two sets of powers in a contemporary manner. While it is true that there have always been conflicts both within the Church and within the State, this paper will examine the conflicts of abortion, homosexuality, and euthanasia between the Church and the State in the United States. The use of the term Church will be clarified for this paper. It will also analyze the origin and distinction of natural law and positive law and apply them to these three conflicts. Finally, a contemporary understanding of the appropriate relationship between the moral law and civil law regarding the conflicts of abortion, homosexuality, and euthanasia will be offered.

It is necessary to clarify exactly what is meant by the term Church in this paper. While it is true that there is a Catholic Church in the United States, there is not an American Catholic Church reflecting the fact that the Catholic Church is universal and connected to the Roman Pontiff always and everywhere. Vatican Council II states correctly from an historical perspective what the term Church meant when it stated that the Church subsists in the Catholic Church which is governed by the successor of Peter and the bishops in communion with him. Though there are many elements of sanctification and truth found outside of its

visible confines, they are gifts belonging to the Church of Christ and are forces impelling towards Catholic unity (Flannery ed., 357).

The relationship of the powers of the Church and State is distinguished in their respective origins. It certainly is true that all the power of any type comes from God though the origin, means, and end to which the particular power is exercised will differ between the Church and State. The Church, unlike the State, was founded in a positive act by Jesus Christ, her Divine Redeemer; hence, the origin is supernatural. The State, however, has its origin in natural law meaning that civil society was naturally bound to come into existence and develop based on the intrinsic nature of how God made human beings. The state was not founded by a positive act of the Divine Redeemer (Barry ed., 1228). To improperly understand the relationship between the Church and State results in an incorrect understanding of the relationship between the supernatural and the natural or in theological terms, between grace and nature.

Though the powers of the Church and State pertain to matters of mixed jurisdiction, the scope and extent of the governance differs significantly between the two sets of powers. The Church, to whom Christ gave the command to teach all nations, embraces the entire life of man which is, of course, necessary for his salvation (Barry ed., 1229). This means that ecclesiastical power embraces not only man's external behavior in terms of acts of commission and omission, but also man's interior thoughts, acts of volition, and emotions. The State, on the other hand, is established to protect and promote the common welfare of society and also the individual members of a society, especially the most vulnerable. The State does not and cannot have any jurisdiction over the interior disposition of man. While the State has its end as the well-being of this earthly life, the church has its proximate object of well-being as eternal life (Barry ed., 1019). This correct misunderstanding reflects the fact that the supernatural perfects the natural or grace perfects nature.

Role of the Church and of the State

Although the Church and State are institutions each in their own right, they differ in how they are governed and the means in which they are governed to the end which they are ordered. Though it is true that John Paul II recalled the Church's esteem for democracy, a system that can only be established when the rights of each and every individual are recognized, the church can never be seen as a democratic institution (National Right to Life Committee, 4). The Church has as her primary role the duty of teaching spiritually and morally the truths of Christ as well as supporting, understanding, and challenging individuals and societies as is necessary. The very nature of that truth is objective, which reflects the fact that man does not and cannot determine truth; rather he discovers truth which exists outside of his being. God, Who is Truth, causes mankind to experience truth in intellect in order to lead man to God, Who is the origin of all truth. This is especially significant as regards the truths of faiths and morals entrusted by Christ to His Church. Pope Pius XII, in 1945, recognized that in the Church, unlike the State, there does not and cannot exist any popular tribunal or

judicial power which comes from the people (Barry ed., 1229). This reflects the fact that since man does not and cannot cause truth, no popular vote can ever legitimately define the truths of faith or morals in the Church. The State, on the other hand, should be legitimately concerned not with the teachings of faith or morals, but in protecting the common welfare of society as well as each and every member of that society, especially the most vulnerable. The State also has the right and duty to impose just penalties on individuals when rights that are individual or collective are truly violated. The State should be legitimately influenced by the Church on all issues of justices as expressed in moral dilemmas since Christ Himself commanded that Peter and the apostles should go into the world and teach all nations, and that He would be with them until the end of time (New American, Matthew: 28:28-20). While the principle of separation of Church and State is a legitimate one, it is erroneous to conclude that these two institutions cannot or should not work together.

One of the conflicts that occurs between Church and State is rooted in the proper distinction between natural law and positive law. While natural law implies a law not made by man yet able to be discovered by use of reason, positive law is nothing more than a law derived from human consent as expressed in the majority will (Krason 3-4). The Church teaches that it is in the fact that Jesus Christ gave divine power to Peter and the apostles such that they and their successors indisputably are to both guard and interpret the whole morality not only of the gospels but also of natural law, since natural law does reveal the will of God and is necessary for salvation (Flannery ed. 398-9). Natural rights, which are based on the natural law, are unfortunately under direct attack today by secular humanists with the idea of replacing natural law with absolute positivism. At the root of the attempt to reject natural law, secular humanists are rejecting God, Who created and sustains nature, from which natural laws are derived. While it is true that government enforcement is necessary to ensure that natural rights are upheld in the life of a society, it is not true that it is the source of them (Krason, 4). No attempt of positive law can ever legitimately define truth which is objective and exists outside of man's being. Though many today accuse this relationship of Church and State as proposed here to be rooted in totalitarianism, it is far from that; on the contrary, the Church aims at liberating and perfecting the human person in this life such that he will experience salvation in the next life (Barry ed., 1229).

Perhaps no conflict has caused more confusion and division in America than that of the U.S. Supreme Court decision *Roe v. Wade* in 1973 which legalized abortion. This decision has essentially allowed abortion on demand throughout the entire nine months of pregnancy. Since the landmark decision of 1973, 25-30 million unborn children have been killed. While almost everyone today has some opinion on abortion, the vast majority of Americans remain largely uninformed and uneducated as to the basic facts regarding abortion.

The truth regarding abortion and the American perception of it continues to be manipulated by the media in favor of the so-called "pro-choice" position. While the media keeps telling us that the majority of American support the "right to choose," research consistently shows that the vast majority of Americans

disapprove of the great majority of abortions performed in the United States (Craycraft, 21-23). Another relevant factor concerns why abortions are performed. While many today think abortions are done largely for rape, incest, or the physical life of the mother, this is not the case. Recent data in Louisiana, for example, demonstrates that 99.6%-99.7% of all abortions done annually in this state are done as a means of birth control (The Louisiana Department of Health and Hospitals Office of Public Health). These are abortions that the vast majority of Americans consistently oppose.

The Church Against Abortion

The Church enters the battle of abortion as a human rights issue of the morality which Christ entrusted to Peter and the apostles, and their successors. The Church recognizes that questions such as what constitutes a human being, when ensoulment takes place, and whether actions of any type are morally good or evil, are matters that are properly philosophical and moral (Flannery ed., 445-6). The Church is the expert by Divine Will to rule in the spectrum of moral matters, among which abortion is included. "Whoever hears the Church, hears Christ. Whoever rejects the Church, rejects Christ. And whoever rejects Christ, rejects the Father" (New American, Luke 10:16).

The Church has always condemned abortion as an abominable crime. It recognizes that abortion is the deliberate taking of an innocent human life: murder. The Church teaches that from the time that the ovum is fertilized, a new life is begun which is neither that of the father nor the mother; rather, it is the life of a new human being with his own growth. (Ratzinger, 13). Scientific experts now know that at the moment of conception of a new human, life has begun (LeJeune, 150). Once this fact is established, many then try to argue that a soul, that which ontologically identifies one as a human being, could not be present and is not present at the moment of conception. I concur with the Australian moral philosopher Nicholas Tonti-Filippini when he states: "A human life comes into existence when a soul gives form to matter and matter assumes the bodily identity of a being which is organized as a single, individual oriented toward the development of specifically human functions such as wondering, doubting, affirming, living, etc. That life is entirely dependent upon the continued dynamic interaction between matter and form (Tonti-Filippini, 33). In other words, it would not be possible, even at the one-cell developmental stage called the zygote, for matter to intrinsically become organized without the presence of a soul. At the moment of conception, a soul must be present such as there is a continual interaction between form and matter as the new human being comes into existence and develops until the moment of natural death. The soul is the substantial form of the body and hence causes the being to be what it is; in this case, a human soul causes an individual human being to exist.

There is no doubt that the Roman Catholic Church has been a powerful voice in protecting the dignity and sanctity of unborn life in America. The Church's condemnation of abortion reflects the fact that abortion violates both natural law and divine law — a teaching, therefore which can never be changed. To bring

out the severity of abortion as a grave crime, the 1983 Code of Canon Law excommunicates all Catholics who cooperate in the deliberate successful ejection of a non-viable fetus. That the Church's voice has been powerful in the United States is exemplified by such happenings as violent disruption of the Holy Sacrifice of the Mass led by Cardinal John O'Connor at St. Patrick's Cathedral in New York. The attack was led by militant homosexuals and those supporting abortion. In this battle, the Church has had tremendous difficulty in getting the media to present the truth of what abortion is and what it does to the unborn child as well as the mother. As a result, the American Catholic bishops gave financial support of five million dollars in hiring a professional media firm to expose the truth of abortion. This brought about a false claim that the principle of the Church and State being separate was being violated. As a result, litigation was instituted in *Abortion Rights Mobilization Inc., et al., petitioners vs. United States Catholic Conference* whereby there was an effort to remove the tax exempt status of the Church based on allegations that the Church's involvement in the abortion controversy placed it outside the requirements for such an exemption. Though the litigation made it to the U.S. Supreme Court, it was ultimately defeated. The truth of the matter is that the Church was involved in preaching the truth of a human rights issue: the killing of innocent, unborn life. The Church was not meddling in the affairs of politicians or in particular political parties; hence, the claim that the Church was being political cannot be supported. The Church has not only the right but also the duty to teach the truth on all social issues with moral components. It has a parallel duty when necessary to point out and resist error and injustice.

The impact of twenty years of abortion is just now starting to be experienced by the second victim of abortion, the mother. Scientific studies are beginning to document that women may suffer psychological effects years later from the violent procedure of abortion. Clinicians are referring to the entity as Post Abortion Syndrome, the corollary of which is Post Traumatic Stress Disorder, a condition which a number of individuals experienced during and after the Vietnam Conflict. It is estimated by statistical extrapolation that between 35,000 and 262,500 out of the 1.5 million women who undergo abortions annually may experience this syndrome and require intense psychotherapy. Symptoms of this syndrome include destructive and broken relationships, preoccupation with pregnancy and the aborted child, self-destructive and self-punishing behavior, alcohol and drug abuse, and various psychosomatic ailments (Mirkes, 3-4). The natural law alone, which is discovered by human reason, supports the fact that women who subject themselves to this violent procedure where their unborn child is destroyed are likely to suffer devastating effects (Angelo, 69-79).

"Gay Rights"

One of the most pressing issues today that is a source of confusion or division is that of so-called "gay rights". There is much unresolved debating as to the causes of homosexuality though it is not portrayed as such. The moral analysis also is construed to be ambiguous. The political agenda of the "gay rights" movement has been gaining increasing acceptance and has become powerful. It is not by

chance that there is so much confusion and division on this issue.

For years there has been debate as to the etiology of homosexuality. Theories have been proposed that attribute the cause of a homosexual orientation to biological roots, which may be genetic and/or hormonal, or to environmental roots in one's developmental upbringing. One study recently received much attention when the neurobiologist Dr. Simon LeVay in 1992 reported that there may be a difference in hypothalamic structure between heterosexual and homosexual men. Unfortunately many automatically concluded that it had been scientifically proven that there was a biological etiology responsible for a homosexual orientation with the implicit understanding that homosexuals could not therefore be morally culpable for their behavior. Dr. LeVay studied four cell groups in the anterior hypothalamus which forms the floor and part of the wall of the third ventricle of the brain and is involved in the regulation of sexual behavior. What LeVay found was that one hypothalamic nucleus (Interstitial Nucleus of the Anterior Hypothalamus 3) was half the size in homosexual men he examined as compared to its size in heterosexual men. The other three cell clusters (INAH 1,2, and 4) showed no difference between heterosexual and homosexual subjects. LeVay's conclusions were careful in that he admitted that these data do not demonstrate if the results are a cause or a consequence of a person's sexual orientation or if there could even be a third variable; however, he did reason that sexual orientation in humans is amenable to being studied at the biological level (Mirkes, 1-2). While LeVay's findings are indeed interesting, we must recognize them for what they are at this time: a scientific hypothesis. It would be erroneous to conclude that LeVay's study has established by scientific fact that the etiology of a homosexual orientation is biological.

In the moral analysis of homosexuality, the Church makes the distinction between orientation and practice. While the etiology of homosexuality remains unknown, the Church recognizes that while the orientation is not normative, it is not an intrinsic evil, hence the orientation alone is not sinful. The Church's teaching on this moral issue is based on both natural law and divine law, both of which recognize that engaging in homosexual behavior of any type is clearly against God's plan for the manner in which He calls human beings to live. Recent studies have examined what effects would be demonstrated morally if LeVay's hypothesis was proven to be a biological fact. The appropriate conclusion to be drawn is that it would not change the fact that homosexual acts are, from a moral perspective, still disordered and against the divine plan for the proper use of human sexual powers (Mirkes, 2-3). This will be explained later with a comparison of moral analysis to other disordered acts with possible biological roots.

The political agenda of the "gay rights" movement has puzzled many and brought about much unnecessary confusion. For example, the use of the term "homophobia" has been cleverly used by the gays to signify that those who oppose homosexual lifestyles are "phobic" meaning that they are suffering from an abnormal psychological fear of homosexuals. The truth is that there are many individuals who oppose homosexual lifestyles not out of a phobia, but because they recognize that these lifestyles objectively violate both natural and divine law

and will ultimately result in destruction. Recent publications have exposed the true agenda of the "gay rights" movement and do in fact that the politics of the movement include forcing society to accept homosexual lifestyles to be as normative as heterosexual ones. There is also the effort to recognize homosexual marriages as legitimate with the adoption of children and sex education in the school which includes instruction on how to engage in homosexual behavior, with the understanding that there is nothing morally inappropriate about it (Dannemeyer, 119-152). Those who actively oppose this political agenda will in all probability be labeled as "homophobic" by gay activists.

The Church's response to individuals who are homosexual in orientation and to the political agenda of the homosexual movement is both a moral and pastoral one. The Church condemns the practice of any homosexual lifestyle or behavior because it is irrefutably against the will of God. Those who engage in this lifestyle in full knowledge and freedom of the will are culpable. The Church calls on all individuals with this orientation to recognize that the only solution is to lead a chaste life which is only possible with God's grace. One recent program designed by Fr. John Harvey to impliment living chastely is named COURAGE whereby Catholics with this orientation are able to lead chaste lives by regular prayer, sacramental grace, and group support. The program is adapted to the twelve steps of Alcoholics Anonymous (Dannemeyer, 116). It recognizes that reliance on self will not suffice; rather, only through God's grace is it possible for anyone to lead a chaste life, a calling from God to each and every human being. While alcoholism is seen to have either possible or probable biological roots which may be genetic, it is recognized that there is most definitely a moral component to this disease which can only be overcome through a greater power than self: God. So, even if it becomes scientifically established that there are biological roots which play a role in the etiology of homosexuality, the moral issue at analysis is in no way altered.

That there is a conflict between Church and State regarding homosexuality is all too obvious. The homosexual movement wants all of society — including the Church — to accept this lifestyle as normative. The Church can never do this because it is clearly against Divine Will. The Church's role is to teach all, including the State, that this lifestyle is wrong in that it is immoral and that it will ultimately result in destruction. While the Church also condemns thoughts and behaviors which promote hatred and harassment toward gays, the Church rejects the ideology that it is morally discriminatory to refuse to accept the authentic "gay rights" movement on all of society. The Church's presence exists to teach all of society the moral truths of God, to attempt to influence and challenge all issues of legislation civilly with moral components, and to provide the necessary means to live out one's life in response to the will of God. It can no longer be said that what two individuals do in private will not affect all of society, either directly or indirectly.

Euthanasia in Holland and the USA

One significant battle which is just beginning in the United States concerns the "right to die." While euthanasia has been legally practiced in Holland under

specified conditions for quite some time, it has only been in the last decade that formal efforts have begun in the United States to pass legislation allowing physician—assisted suicide based on the Netherlands model (Takken, 6). Various organizations are formally promoting this so-called right. The scientific findings of those wishing to end their lives are relevant both morally and psychologically to this issue. The Church is in a unique position to not only teach the moral issue on this matter but also to be present to those who are suffering in any dimension. Finally, the Church is in a position to influence the legislative issue of euthanasia from a moral perspective by her teachings to all men and women of good will who are receptive to Divine Will and who are open to living it out in their lives.

The term euthanasia refers to an easy death without suffering (Flannery, 512). Most people today totally dread the idea of prolonged, intense suffering. Unfortunately, many today in our society appear to lack a proper understanding of the relationship of suffering to redemptive salvation in Christianity or they outright reject it. Also, many today fail to make the proper ethical distinctions in treatments that are available in terms of their being ordinary or extraordinary. This we know because it is very common to hear people say that they would never want to be put on artificial machines and at the same time they do not understand fully the implications of their statements in terms of the moral dimension. Many today fail to realize that with the narcotics and analgesics that are available today, excruciating pain can almost always be controlled (Blanchet, interview). As a result of the perceptions and modes of thinking, many today are arguing that the only compassionate action in a terminal patient who requests death is to assist them in that death; ironically, those who refuse to cooperate in that death are portrayed as cold and uncaring.

Recently, the Dutch Governmental Committee on Euthanasia published some alarming findings as to the practice of euthanasia in Holland. The data indicate that a total of 25,706 cases of euthanasia occur annually in Holland. This constitutes 19.7 percent of the total number of deaths in that country. Of this number, 14,691 cases of euthanasia were performed involuntarily. This constitutes 11.3 percent of all deaths in Holland. In the cases of involuntary euthanasia, the means of killing the patient included active measures: morphine given in excessive doses, and stopping or withholding life-prolonging treatment with the intention to cause death. What is unique to these 14,691 cases of euthanasia is that they all occurred without any knowledge whatsoever or consent of the patient or family. This study is the first official admission that active involuntary euthanasia is regularly practiced in Holland. (Fenigsen, 339-44).

In the United States, efforts have been gaining increasing momentum to accept the legalization of euthanasia. Proposition 161 of California and Initiative 119 of Washington State have in recent times allowed voters to go to the polls and decide if physicians should be legally allowed to end their patients' lives (Bayley, 1). Though both proposals were defeated, there seems to be an increasing acceptance in the name of compassion to make physician-assisted suicide available to those who meet specific conditions and request it. Organizations

such as "The Hemlock Society" and "The Society for the Right to Die" are actively lobbying and attempting to reeducate society into this mode of thinking, in order that such proposals become legalized. Since efforts to legalize euthanasia in the United States are to some degree based on the Dutch model, we have every reason to believe that what occurred in Holland could happen in America. The Dutch study demonstrates that with doctors killing patients who request it and meet strict criteria, with time, the process evolves into doctors killing patients with no knowledge and no consent, a horrendous violation of the code of medical ethics. Such killing becomes practiced casually and in large numbers. Doctors subjectively decide whose lives are worth living and whose lives are unfit to be continued.

Recent psychological studies have focused on whether it is possible for a person to rationally request that his life be ended. This revolves around a question very frequently asked today: How morally culpable is one who requests death? The Church has always taught that to incur culpability, one must possess full knowledge and freedom of the will; when these conditions are not present, moral culpability can be reduced or eliminated. Current psychological studies indicate that almost all individuals who die by suicide are in good physical health; furthermore, they demonstrate that most individuals who die by suicide show evidence of a major psychopathology, usually temporary (Clark, 151-4). Given these findings, the most uncompassionate and inhumane thing one could possibly do would be to cooperate in helping a person obtain death who requests it, as opposed to getting the proper psychological and spiritual help the person is in need of obtaining, even though they may not recognize it as such. The Church enters the conflict of euthanasia as a human rights issue with a moral dimension. Since all life comes from, belongs to, and ultimately goes back to God, the Church has the right and duty to teach all the will of God on human suffering, dying, and eternal life. The Church has always taught that suffering is a part of the human condition; in fact, there can be no eternal life for those who freely and knowingly reject suffering that comes to them (New American, Matthew 16:24-8). While the Church does not seek to place heavy burdens or suffering on individuals and does attempt to relieve suffering, she condemns those actions of individuals who are suffering who take their own lives or ask others to assist them in the process of ending their lives. Such actions violate both natural law and divine law. They fail to recognize that there is intrinsic value and dignity still present in the suffering person and the terminal patient just like everyone else. Also, such actions fail to recognize that when individuals ask to be killed, it is almost always a plea for love, affirmation, and compassion though it may not be recognized as such (Flannery, ed. 513).

Moral Truth into Action

The Church is able to be a significant influence to the State. She is able to do this by teaching the truth of Christ that despite good, subjective intentions to alleviate human suffering, killing the patient is against natural law and divine law; it is, in fact, against the way God wishes his people to live in order that they obtain eternal life. All men and women of good will, be it those who go to the polls to

vote or those in state and federal offices representing their constituents, are called to receive the authentic teachings of this moral truth and put it into action in their public and private lives.

While the conflicts of abortion, homosexuality, and euthanasia all involve a direct violation of the natural law and divine law, all of society will suffer if the civil law is unjust. Public authorities must be concerned with rational principles which regulate civil law and moral law. It is never proper for civil law to take the place of conscience or to attempt to dictate norms which are outside of its competence. Whenever a positive law deprives any group of human beings equality of all before the law, the very foundations of a State are undermined. The State should be bound to guarantee the institution of the family, upon which society is based, and truly be at the service of the family. It is part of all public authority to see that civil law is regulated according to the fundamental norms of moral law in matters pertaining to human rights, human life, and the institution of the family (Ratzinger, 36-8). Failure of the State to do this automatically results in injustice. Recent decisions of the U.S. Supreme Court indicate that the current trend is dangerous: a secularization which not only separates Church and State, but does not allow these two institutions to work together at all (Murray, 37). Regrettably, all of society will be damaged by this trend. It is time for all men and women of good will to speak out again, namely, that we affirm the principle of separation of Church and State; however, we believe it erroneous that these two institutions cannot and should not work together lest all of society become endangered.

BIBLIOGRAPHY

- Angelo, E. Joanne. "Psychiatric Sequelae of Abortion: The Many Faces of Post-Abortion Grief." *The Linacre Quarterly* 59.2 (1992):69-80
- Barry, Colman J., ed. *Readings in Church History* Rev. ed. Westminster: Christian Classics, 1985.
- Bayley, Corrine. "Why We Should Vote No on Proposition 161." *Ethical Currents* 31 (1992):1-4.
- Blanchet, Paulette M. Personal interview. 22 January 1993.
- Clark, David C. "'Rational' Suicide and People with Terminal Conditions or Disabilities." *Issues in Law & Medicine* 8 (1992):147-166.
- Craycraft, Kenneth. "Fact and Fiction: What Americans Really Think About Abortion." *Crisis* 9.5 (1991):21-23:
- Dannemeyer, William. *Shadow in the Land: Homosexuality in America*. San Francisco: Ignatius, 1989.
- Fenigsen, Richard. "The Report of the Dutch Governmental Committee on Euthanasia." *Issues in Law & Medicine* 7 (1991):339-344.
- Flannery, Austin, ed. *Vatican Council II*. Northport: Costello, 1982.
- Krason, Stephen M. "Natural Rights: A Given?" *Ethics & Medics* 15.8 (1990):3-4.
- LeJune, Jerome. *The Concentration Can*. San Francisco: Ignatius, 1991.
- Mirkes, Renee M. "Science, Homosexuality, and the Church." *Ethics & Medics* 17.6 (1992):1-3.
- Murray, John C. "First Things." *A Common Enemy, A Common Cause* 26 (1992):29-37.

National Right to Life Committee. *Religious Outreach Newsletter*. Washington, D.C.: National Right to Life Committee, 1991.

Ratzinger, Joseph. *Instruction on Respect for Human Life in its Origin and on the Dignity of Procreation: Replies to Certain Questions of the Day*. Boston: St. Paul, 1987.

Takken, Teresa, A. "California and the Netherlands: Variant Understandings of Mercy Killing." *Ethical Currents* 12 (1987):3

Tonti-Filippini, Nicholas. "Determining When Death has Occurred." *The Linacre Quarterly* 58.1 (1991):25-49.