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# *Agnostic Historical Jesus Scholars Decimate the Mythical Jesus Popularists*

A Review Essay on Jesus: Evidence and Argument or Mythicist Myths?

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*Jesus: Evidence and Argument or Mythicist Myths?* By Maurice Casey. London: Bloomsbury T&T Clark Academic, 2014. 272 pages. \$25.99.

Maurice Casey was Emeritus Professor at the University of Nottingham prior to his death in 2014. Although he initially expected to become an Anglican priest, he left the Christian faith in 1962 while working on a theology degree at the University of Durham, where he was "exposed to quite outstanding critical scholarship." Casey testifies that he was later known for being "completely irreligious."<sup>1</sup>

In a volume published in the year of his death, Casey wrote a major treatise against the mythicist view that Jesus probably never existed. Bart Ehrman, calling himself "an agnostic with atheist leanings," had also written

ABSTRACT: This review article examines the late agnostic New Testament scholar Maurice Casey's criticisms of the so-called mythicist position, which argues that Jesus did not exist. Casey's volume *Jesus: Evidence and Argument or Mythicist Myths?* is viewed along with Bart Ehrman's critique of similar ideas in his text *Did Jesus Exist?* We will highlight important objections raised by these agnostic scholars against those in the mythicist movement, including topics such as various idiosyncrasies leading to historically deficient methods, egregiously late-dating the canonical Gospels, claiming inspiration from earlier mystery religions, and positing textual interpolations.

1. Maurice Casey, *Jesus: Evidence and Argument or Mythicist Myths?* (London: Bloomsbury T&T Clark Academic, 2014), 3, 36–41, with the quotations on 37 and 39 respectively. Most page numbers from this volume alone will be listed in the text.

a critical book on this same topic two years before Casey.<sup>2</sup> While there is a fair amount of overlap in their general responses to mythicism, there are key differences as well. Casey does not engage much with Ehrman's work, but does state briefly that it "contained a number of good points, but also a small number of regrettable mistakes" (17).

This review essay begins with a summation of Casey's work in order to point out his approach and contributions. Then it highlights a few key themes along with some critical discussion concerning the mythicist arguments. Our chief emphasis throughout is the interaction between Casey and his intended audience.

#### Overview

Even surveying the introduction, readers will quickly encounter an acerbic, almost wholly negative, scoffing tone from Casey against the mythicists.<sup>3</sup> The majority of the introduction, however, provides the reader with biographical backgrounds of a significant number of mythicist "scholars" and "bloggers," including Ehrman among them as "an outstanding scholar" (17). One benefit is that this helps the reader to understand better the background of the mythicists (10–36). Casey concludes the introduction, which is actually chapter 1, with his own biography (36–41).

The second chapter discusses the "Historical Method" and how mythicists only pretend to employ this discipline. But Casey spends more time on the failures of mythicism, asserting up front that, "Mythicists have not the foggiest notion of historical method and they do have a massive amount of bias and prejudice to put in its place" (43). He finds that the mythicists "total contempt for sound historical method" (59) is because many mythicists are essentially "former fundamentalist Christians, who begin with their faith, and fit the evidence into it. They have had a conversion experience away from Christianity, and they are no more sympathetic to critical scholarship now than they were before" (59, cf. 36, 243).

Several other key themes also emerge here, like Casey introducing the question of dating the Synoptic Gospels (51–4), as well as the common contention that there is little awareness of details regarding the historical Jesus in Paul's epistles (54–9). Setting up the next chapter is the intriguing comment

<sup>2.</sup> Bart D. Ehrman, *Did Jesus Exist? The Historical Argument for Jesus of Nazareth* (NY: Harper Collins, 2012), 5.

<sup>3.</sup> Especially since other commentators and reviewers have already noted the brashness of Casey's book, we will not often elaborate on that element except to note that Casey is more aggressive than most. For more on Casey's approach, consider John Court, who questions whether Casey's tone is beneficial, while Euan Marley humorously describes Casey's antagonism (John M. Court, "Maurice Casey, *Jesus: Evidence and Argument or Mythicist Myths?*," *Theology* 118 (2015): 53–4; Euan Marley, "*Jesus: Evidence and Argument or Mythicist Myths?*, by Maurice Casey, Bloomsbury, London, 2014," *New Blackfriars* 97 (2016): 235–7.

ending chapter 2: "We must consider next the overwhelming evidence for the early date of the Gospels of Mark and Matthew, and the reliability of parts of all three of the synoptic Gospels" (59).

Chapter 3 discusses the Synoptic Gospels as important and reliable sources that mythicists attempt to date far too late. Casey criticizes attempts to do this by Dorothy Murdock (alias Archaya S), "Blogger Godfrey," and Earl Doherty by pointing to the failures of their methods. Aside from a negative critique alone, Casey also continues a lengthy treatment of dating the synoptic Gospels (66–104). Entirely surprising to many is that Casey dates Mark and Matthew much earlier even than many conservative Christian scholars! He sides with his former student James Crossley in concluding that Mark was written in approximately 40 AD (90), while dating Matthew about 50–60 AD (96)! Luke is assigned to a more conventional date of 80–90 AD (104). Supporting his early dates for the first two Gospels, Casey also highlights aspects of their cultural context by treating the use of the underlying Aramaic text, perhaps the chief area of Casey's expertise (68–74).

Chapters 4 and 5 deal with a major argument raised by mythicists which suggests, basically, "that, if there had been a historical Jesus, various things would have been written in the New Testament, and since they are not found there, Jesus cannot have existed" (109, 133). Casey separates his response into two chapters: chapter 4 takes up this issue in the Gospels and the Q source, while chapter 5 is concerned with the absence of more historical Jesus details in Paul's epistles. Casey quickly expresses his thoughts on this argument, stating that it is a "massive argument from silence, applied to a high context situation and . . . is entirely false" (109). "Everything is wrong with this" (110, 128), charges Casey in his analysis of Murdock and Doherty's arguments pertaining to the silence in Q, as he explains what he finds to be the major historical and methodological problems associated with their arguments.

Casey explains that mythicists "do not understand the *genre* of the epistles, nor do they understand any high context culture or situation" (134, Casey's emphasis). While the Gospels are more properly within the genre of ancient *bioi* (biography) (110, 130, 134, 234), the Epistles are letters written to believers and there is plenty of data to indicate that the details of Jesus's life were taken for granted due to the high context culture.

For example, Casey is particularly critical of three arguments presented by Doherty: the silence of Paul regarding Jesus's death on "Calvary" (142), the silence of the Epistles on relics such as the crucifixion nails (143), and the silence about Jesus's mother Mary (147). Doherty suggests that these are precisely the types of things that we would expect to find in the Epistles if Jesus did exist. Casey identifies the flaws in these arguments, especially emphasizing that they anachronistically project later Christianity onto the earliest years. This highlights how a defective methodology led to the absence of a strong or persuasive argument. For Casey, Doherty has simply exchanged his Roman Catholic fundamentalist tradition for a mythicist fundamentalist tradition (143, 112, 178).

In a detailed and central sixth chapter, Casey examines the references to Jesus's birth, teachings, death, and resurrection in the Epistles (especially Paul's) that are challenged by mythicists. Casey summarizes their approach to this data and believes that, "Mythicists do their utmost to dispose of these relatively few references with strange exegesis and allegations of interpolations" (173).

One subject where Casey charges the mythicists with employing such tactics regards Jesus's death by crucifixion. For instance, in 1 Thessalonians 2:14–16, Doherty makes use of one of the mythicists' favorite tricks in order to deny that Jesus's recent death was well known in the early church: this text must have been an interpolation (182–5)! So Doherty attempts to avoid a recent historical crucifixion in the real, space-time world, preferring instead to hold that Jesus was "crucified" mythically in "the sublunary realm" (188). This certainly has every appearance of being willing to say almost anything rather than facing squarely the clear evidence at hand.

Regarding the even more evidential, crucial text in 1 Corinthians 15:3–7, Casey strongly challenges Doherty's exegesis. Paul's Corinthian readers knew that Jesus had lived and had been crucified *recently*, and they also believed that Jesus has been raised from the dead afterwards. While the Corinthians may have known all of this, "Doherty and other mythicists do not wish to know" these things (187)!

Moreover, Doherty was guided by an overliteral understanding of Paul's testimony in Galatians 1:12–13. According to Doherty, Paul's conversion experience was due to a *spiritual* revelation from the Lord, as opposed to a tradition handed down from the other apostles (185–8). For Casey, this is a completely unacceptable understanding of this text in Galatians as well as a failure to comprehend how Jewish tradition was passed down (179–81), calling Doherty's position here simply "ludicrous" (186).

Summing up the mythicist examples here, Casey judges that they are "unacceptable pseudo-scholarship" (201). Casey states that "Doherty has three tricks." (1) His favorite move is to state that if an event or teaching is not stated explicitly in the text, then no one believed it. (2) He held that the New Testament teachings about Jesus's crucifixion meant that he was "crucified in the heavens" rather than on earth, in real history. (3) Then when the texts fail to support his claims, even disproving them, Doherty often holds that "someone added the supposedly secondary additions which he wishes to dispose of" (198–9). Of course, in that case, the texts count for nothing! Casey's conclusion concerning the mythicist positions will probably not surprise many readers. The last sentence in this chapter reads: "They simply

show the extraordinary extent to which anti-Christian views have produced uncritical and unscholarly results" (201).

Chapter 7 presents another familiar topic among mythicists, namely, the supposed parallels between Christianity and other religions which show that Jesus was only a mythical figure.<sup>4</sup> Casey argues that when considering parallels one should always consider Samuel Sandmel's famous warnings in his essay, "Parallelomania."<sup>5</sup> Yet the mythicists have not only "ignored Sandmel's warning, but they have perpetrated even more serious examples than the ones he criticized" (204).

Casey then evaluates some major occurrences and teachings in Jesus's life (such as the virgin birth, baptism, and crucifixion) where mythicists have attempted to show that the earliest Christians borrowed from surrounding religions. Casey provides an apt overview, summary, and evaluation of many of these mythicist charges. As with the remainder of this volume, he is very critical of these approaches. As he states in the first sentence of his conclusion: "In this chapter, I have surveyed nothing but mistakes" (242).

After a brief conclusion summarizing some of the major themes in the book (243–5), Casey also includes a short appendix that discusses Latinisms in the Gospel of Mark, another topic on which he had been challenged by mythicist bloggers. Casey returns again to a central point that he has been weaving throughout this text. Mythicists often trade their former religious fundamentalism for another, secular variety, retaining highly flawed mannerisms that are unconcerned with critical inquiry. They sport an ideology at the expense of good arguments. Scholarship and critical inquiry were never crucial to the mythicists and it continues to be unimportant to them now. Accordingly, the first sentence of the Appendix Conclusion reads: "This appendix is a catalogue of confident and incompetent mistakes, much fueled by anti-Christian and anti-scholarly prejudices" (259).

#### Discussion: Unpacking Major Mythicist Errors

Mythicist fundamentalism has produced an unhistorical method that is defective in a very large number of places. The main reason, Casey argues, is that many of these mythicists have essentially traded their earlier *uncritical* conservative religious fundamentalism for another more *uncritical*, irreligious version (8, 14, 31, 118, 168, 206, 220). Casey emphasizes this point much more strongly than does Ehrman. The lack of appreciation for true scholarship found in the mythicist camp has led to a number of methodological problems that Casey identifies throughout the book. A few of these strands may now be pulled together.

<sup>4.</sup> The chapter is rather hilariously entitled: "It All Happened Before, in Egypt, India, or Wherever You Fancy, But There Was Nowhere for It to Happen in Israel" (203).

<sup>5.</sup> Samuel Sandmel, "Parallelomania," Journal of Biblical Literature 81 (1962): 1-13.

# Many Idiosyncrasies and Shortcomings

By accepting uncritical approaches and thinking patterns, mythicists are vulnerable to a large number of objections regarding their poor research abilities. Casey raises these criticisms on a number of fronts, from the beginning until the end, protesting that the problem is endemic to each of their arguments. For examples, mythicists are usually amateurs who are far removed from relevant fields (viii, 10, 20–2, 26–7, 243–4), they often employ out-of-date scholarship (18, 20, 22, 44–9, 63, 119, 238, 244), they fail repeatedly to list adequate scholarly references, sometimes ignoring them almost altogether (61, 74, 148–49, 156, 197, 222), and too often they lack an appreciation of the cultural context and background of New Testament writings (52–9, 79, 119, 127, 144, 206).

Further, if these issues are not enough, mythicists are often ignorant of the current state of scholarly discussions (27, 30–1, 59, 169, 118–31, 140, 143, 147, 150, 243), cannot read texts (including languages) adequately (16, 22, 126, 131), sometimes seem to enjoy purposely misrepresenting or ignoring critical and/or opposing scholarship (8, 27, 77, 143, 167, 243), and simply make a host of statements that are untrue (18, 24, 28, 30, 48). Overall, they tend to be "fueled by atheism and anti-religion," a virulent emotion which seems to produce bias and warp their arguments, including attacking contrary positions because the latter are thought to be religiously-motivated (viii, 14–15, 63, 118). These techniques are simply unacceptable as a way of doing scholarship and, for Casey, reflect their backward ways.

# Dating the Canonical Gospels

Further, when the mythicists operate with such a variety of flawed methods, the unsurprising result is even more-seriously flawed conclusions. While the issues just listed may tend to be more of the nagging and tiresome variety, others are so huge that they often skew a majority of the mythicist's major conclusions.

One example here is the incredibly late dates that mythicists often prefer and assert for the composition of the synoptic Gospels. This is one area where Casey is particularly critical and frequently frustrated (45–6, 49, 51– 4, 61, 66, 107–8, 134, 150, 173). In addition to the complaints raised above, he argues that mythicists need these late dates in order for their arguments to sound more credible. Yet the mythicists seek to achieve their ends by making various anachronistic moves (48), as well as obtaining dates by methods that are foreign to that pursued by scholars.

One particularly interesting example is noted by Casey, who rightly chastises Murdock for dating the Gospels not according to the time of the original writing, but by using the date of surviving manuscripts and placing the dates of these writings at approximately 180 AD (49–51, 62–3, 107). Casey quips that while the earliest full copy of the ancient historian Thucydides is very late, dating to the tenth century CE, "no one is mad enough to suggest that Thucydides should therefore be dated later than the fifth century BCE," or some 1,300 years earlier (50)! Casey responds by pointing out the strength of the Gospel textual evidence, which generally supersedes Greco-Roman and Jewish writings (49).<sup>6</sup> Moreover, *no* classical scholars date their works based upon surviving manuscripts. So why do many or even most mythicists accept such wildly late dates for the Gospels?

On the other hand, the best-regarded critical scholars in the field, whether agnostic, liberal, moderate, or conservative, usually date the Synoptic Gospels some one hundred years earlier or more than do the late-dating mythicists. We have noted that Casey even dates Mark to about 40 AD, Matthew to about 50–60, and places Luke at the more traditional 80–90 AD (108)—up to almost 150 years earlier than the mythicists for Mark. But how can the latter insist on these aberrant dates when a small *copy* of John (the *latest* Gospel) was found far away from its traditional geographical origin and *still* predates Murdock's date by a half century? (63) Accordingly, Casey refers constantly to these mythicist shenanigans as "ludicrously late dates" (cf. 45, 54, 134). His advice? "The very late dates for the canonical Gospels proposed by the mythicists should be uniformly rejected" (107).

But the incredible import of this last conclusion should not be missed. If the Gospels are to be dated where the vast majority of scholars, liberals and otherwise, place them—in the last third of the first century—we are at least a century closer to the life of the historical Jesus. No major world religion possesses any earlier records of their founder's teachings.<sup>7</sup> Further, there is virtually nothing like this in the entire ancient, classical world!<sup>8</sup> This astounding difference with the mythicists sheds a different light on their desire to late-date the Gospels a full century beyond virtually anyone else. It looks like, if they are wrong on this subject, their entire thesis fails.

<sup>6.</sup> Ehrman points out how much more superior the texts are for the historicity of Jesus, sources that come especially from the New Testament itself (*Did Jesus Exist?* esp. 78). For an application of these multiple texts to several knowable areas of the life of the historical Jesus, see Ehrman, *Did Jesus Exist?*, 288–93.

<sup>7.</sup> John A. T. Robinson, *Can We Trust the New Testament?* (Grand Rapids, MI: Eerdmans, 1977), 7, 36; Edwin M. Yamauchi, *Jesus, Zoroaster, Buddha, Socrates, Muhammad*, rev. ed. (Downers Grove, IL: InterVarsity, 1972), 5–11; Edward Conze, ed. and trans., *Buddhist Scriptures* (London: Penguin, 1959), 11–12.

<sup>8.</sup> Ehrman, *Did Jesus Exist*?, 78. Two other skeptical scholars here include Helmut Koester, *Introduction to the New Testament*, vol. 2, *History and Literature of Early Christianity*, trans. Helmut Koester (Philadelphia: Fortress, 1982), 15–17; Robinson, *Can We Trust the New Testament*?, 33–42.

# Positing Interpolations

Casey also argues that similar issues are discovered when troublesome historical data are learned that are simply very inconvenient for the mythical position. When confronted especially with counterfactual data of an exceptionally serious nature, the sort that could by themselves dismantle central aspects of their positions, mythicists frequently resort to simply expunging all of the evidence. As described by Casey: "This is the standard ploy by mythicists. They cannot cope with the evidence as it stands, and constantly seek to alter it by positing interpolations" (10). Again: "Mythicists have, however, invented all kinds of spurious reasons for imagining that Paul did not really write such passages" (244). Doherty is an example of one who rejects the material "which he wishes to dispose of" (199).

Basically, the mythicists assert that this or that comment is not the sort of thing that a particular author would utter, so they attribute it to a later addition by Christians. Then they summarily dismiss the entire bothersome text, even when there is not a single piece of textual evidence for their move.

For example, Ehrman cites a particular tendency for mythicists who do not like fairly early references to the historical Jesus in Roman writers like Tacitus, Suetonius, and Pliny, so they may claim that Christians inserted them (even if the citations are very negative towards believers). Ehrman states that he does not know "of any trained classicists or scholars of ancient Rome who think this, and it seems highly unlikely."<sup>9</sup> The same story goes for the two important Josephus passages which identify James as the brother of Jesus (*Antiquities* 20.9.1), and the longer, so-called *Testimonium Flavianum* (*Antiquities* 18.3.3).<sup>10</sup> Ehrman rather hilariously terms these outright textual rejections by the mythicists as "the principle of convenience."<sup>11</sup>

Addressing how mythicists sometimes merely dismiss major historical and theological texts in Paul's authentic epistles that would otherwise disprove their accusations, Ehrman adds a devastating comment regarding this common mythicist practice: "there is no textual evidence that these passages were not originally in Paul (they appear in every single manuscript of Paul that we have) and no solid literary grounds for thinking they were not in Paul. Paul almost certainly wrote them." Then taking a further poke at the mythicists, Ehrman states that "it is passing strange" that the mythicists did not whisk away as interpolations additional wearisome items for them, such as the virgin birth, Jesus's miracles, and his trial before Pilate.<sup>12</sup> Ehrman

12. Ibid., 133.

<sup>9.</sup> Ehrman, Did Jesus Exist?, 55.

<sup>10.</sup> Ibid., 59-60.

<sup>11.</sup> Ibid., 118, or conversely, the "scholarship of convenience" (133), or "textual studies driven by convenience" (253).

concludes the matter: "Here again we see history being done according to convenience."<sup>13</sup>

It is indeed convenient if one can simply take scissors and excise bothersome texts that threaten to wipe out conclusions, doing so in one fell swoop. But doing this without any evidence, while merely asserting the subjective notion that this or that passage seems to get in the way of what the author was *actually* trying to express, is not just too easy. It and other practices are simply unscholarly, which is precisely what agnostic scholars like Casey and Ehrman assert, sometimes in very strong terms.<sup>14</sup>

#### More Preposterous Arguments

One embarrassing example concerns Josephus's reference to James, the brother of Jesus, the so-called Christ (*Antiquities* 20.9.1). James lived in Jerusalem in the early 60s AD, so if Jesus were indeed James's brother, this would also make Jesus a literal person who likewise lived in the first century. But the mythicists could never handle anything like this, so something needed to be done. Some expunged the text as another interpolation, though a very popular solution is to suggest that rather than identifying Jesus as James's actual brother, there may have been a group of Christians in the early church who were called "the brethren of the Lord." Yet, why would Josephus care about identifying obscure church groups? As Ehrman would say, how convenient! This is in spite of James also being called the brother of Jesus in an admittedly authentic Pauline epistle (Gal. 1:18–19), even as the existence of Jesus's other siblings is also acknowledged in Mark 3:21, 31–32, as well as in each of the other canonical Gospels.<sup>15</sup> This is plainly a self-serving case of special pleading.

There are also other important indications that Jesus lived in the first century. Paul referred to Jesus's apostles, brothers, and other contemporaries (1 Cor. 9:5; 15:5). Further, Paul knew personally each of the major apostles (Gal. 1:18–19; 2:9; 2:11), including that the risen Jesus had appeared to them (1 Cor. 15:5, 7, 11). He included the tradition that most of the 500 witnesses who saw the resurrected Jesus were still alive (1 Cor. 15:6). Such dismissals of contrary evidence are continually challenged by Casey (75, 173, 176, 182, 213).

A last issue is Casey's identifying a number of significant problems associated with what might be the most popular mythicist argument, namely that Christianity borrowed from various other ancient religions to create the

<sup>13.</sup> Ibid., 191.

<sup>14.</sup> Casey, Jesus, 10, 18, 20–2, 26–8,142–7, 150, 169, 201, 243–5; Ehrman, Did Jesus Exist?, 2–3, 17, 20–1, 195–6, 268.

<sup>15.</sup> Casey, *Jesus*, 10, 169–71; Ehrman, *Did Jesus Exist*?, 120, 146, 149–51. Ehrman lists four independent sources from the first century for Jesus having brothers (151).

mythical figure of Jesus. Casey, along with virtually all scholars today, find nothing but errors in such an argument (208, 242).

Initially, even if one were to grant the premises that Christians borrowed from other religions, it would not follow that Jesus never existed (203). Yet this is only where the issues begin, as Casey again asserts faulty historical maneuvers as well as simply false data. While discussing "Parallelomania," Casey complains that some of the assumed similarities are faulty applications of the mythicists' "linguistic incompetence" (207, 209–11), while many others are due to sources and/or traditions that actually *postdate* Christianity (208–9, 215, 218). Still other events are not even remotely parallel (214, 219, 220, 228–9, 230–3).

For Casey, arguably the most "ridiculous" parallel ever concocted by a mythicist is that of Murdock using Christian vocabulary to describe the washing and pickling of vegetables as a parallel to *baptizing* these vegetables (215–16). In another case, Murdock describes an episode of Krishna being shot in the foot by an arrow, under a tree. This then becomes his being suspended in the tree and shot with many arrows, to being described as being nailed to the tree. For Casey, there is no excuse for this looseness and such instances serve to expose the extent to which the anti-Christian ideology of mythicists has ultimately cast any historical method to the wayside (232).

Ehrman provides more details and is even tougher on the mythicists, though only hints can be provided here. Ehrman asserts that no ancient sources teach that any ancient gods returned to earth after death or were resurrected. Other major issues include the perennial sore spot of very few or no scholarly sources being cited by the mythicists, no demonstrated influence of these beliefs in Palestine, there being far too many differences between the ancient stories and the Christian accounts while many supposed parallels are not close at all, and some accounts frankly being made up.<sup>16</sup>

Actually, the "dying and rising gods" parallels have "fallen on hard times among scholars" ever since the turn of the twentieth century. Even those very few scholars who still support a couple of aspects provide data that are too sketchy, and they still do not conclude that any of these examples include gods who are worshipped, or contain an atoning death and resurrection, like Jesus. Actually, there is nothing like the resurrection message in the mythical accounts at all. As Ehrman concludes concerning the pagan accounts, "Some die but don't return; some disappear without dying and do return; but none of them die and return."<sup>17</sup>

<sup>16.</sup> Ehrman, Did Jesus Exist?, 26, 207-30, 256-8.

<sup>17.</sup> Ibid., esp. 222-9, with the two quotations on 222, 229, respectively.

### Conclusion

To say that Casey often dismissed mythicists as unscholarly is an understatement. Seldom do preeminent scholars step up and demarcate such problems. But it is even more uncommon when the scholars are agnostics like Casey and Ehrman, since they are not defending Christianity. This adds a different dimension to their critiques. Casey's criticisms are sometimes distinctive, especially regarding Aramaic studies, though many of his thoughts can be found in other scholars. Casey is, however, far more biting than most, where he is sometimes fighting fire with fire. Highlighting the many uncritical, undocumented, and dogmatic assertions of the mythicist groups, Casey seeks to show the problems that readily occur when one disregards historical method in favor of a biased ideology. As he ends his volume's conclusion: "The mythicist view should therefore be regarded as verifiably false from beginning to end" (243).