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ΙΩΑΝΝΗΣ ΚΑΙ ΙΑΚΩΒΟΣ

Quo Vadis, America?¹

THERE ARE TWO WAYS, ONE OF LIFE AND ONE OF DEATH,
BUT A GREAT DIFFERENCE BETWEEN THE TWO WAYS.²



A Pastoral Letter from the Most Reverend John O. Barres
To the People of God in the Diocese of Rockville Centre on the occasion
of the United States Supreme Court Decision in *Dobbs v. Jackson*

My dear Brothers and Sisters in Christ:

The Supreme Court of the United States has rendered a decision of the greatest importance to all Americans. On this occasion, I write you this Pastoral Letter so that together we may reflect on the meaning of this historic case, reexamine what it is that we believe, and prepare ourselves for the journey that now lies ahead.

I. Where We Find Ourselves

After forty-nine years, a majority of the Court has finally overruled *Roe v. Wade*³, the 1973 decision which turned abortion into a constitutional right in the United States. Since that time, it is estimated that more than sixty million children in America have died in abortions performed in our country. Today, even as we mourn their deaths, we can give thanks to God that this case has finally been overturned. It is a blessing that this gravely immoral decision did not live to celebrate its own fiftieth anniversary.

In the case of *Dobbs v. Jackson*⁴, Justice Samuel Alito, writing the opinion for the majority of the Court, said:



Roe was egregiously wrong from the start. Its reasoning was exceptionally weak, and the decision has had damaging consequences. And far from bringing about a national settlement of the abortion issue, *Roe* ... enflamed debate and deepened division. It is time to heed the Constitution and return the issue of abortion to the people's elected representatives. "The permissibility of abortion, and the limitations, upon it, are to be resolved like most important questions in our democracy: by citizens trying to persuade one another and then voting."



We the People of the United States, in order to form a more perfect Union, establish Justice, insure domestic Tranquillity, provide for the common defence, promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.

Casey, 505 U.S., at 979 (Scalia, J., concurring in the judgment in part and dissenting in part). That is what the Constitution and the rule of law demand.⁵

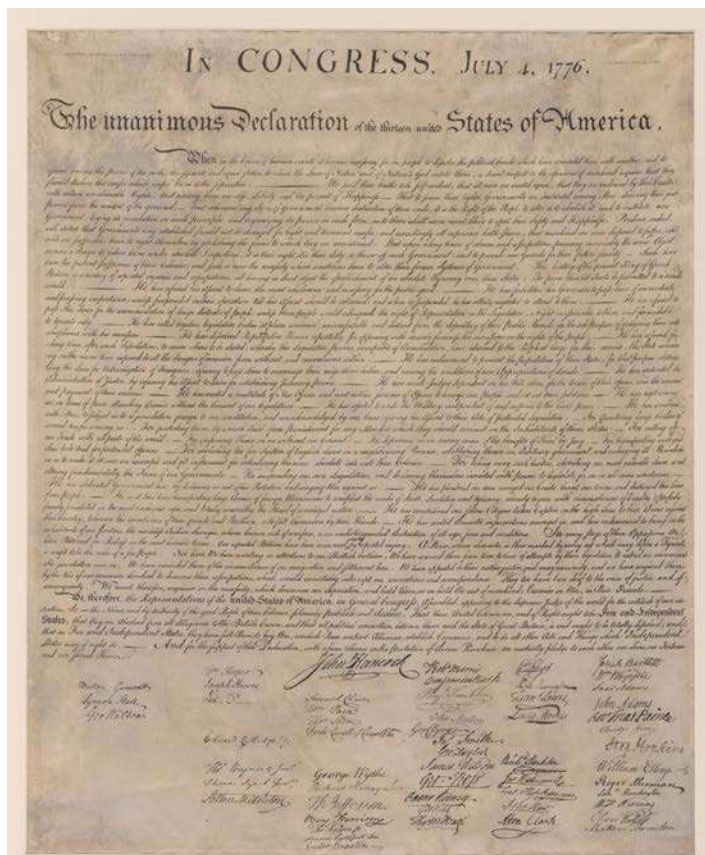
It is not necessary here and now to revisit the complex legal arguments at play in this case, or in *Roe*, for that matter. In our legal system the decision in *Dobbs* means that this issue will now be returned to the states, and therefore to the will of the American voter where, under our Constitution, it should have remained all along. However, in this consequential moment, it will be helpful to look back to see how we arrived at this place, as a prelude to see how we should go forward from here.

In 1970, three years before the Supreme Court of the United States would “find” a right to abortion in the Constitution where it had never existed before, New York passed the most liberal abortion law in the nation. The law allowed abortions to be performed up to six

months into a pregnancy and at any time up to birth if the woman’s life was “at risk”, though it did not define what constituted “risk”.⁶ Therefore, in 1970, New York began to allow abortion virtually on demand throughout the entire course of pregnancy. The states of Hawaii, Washington and Alaska passed similar statues that year, legalizing abortion for their state residents only. New York imposed no such requirement.⁷

In January of 1973, just prior to *Roe v. Wade*, thirty states had laws that banned abortion completely, and sixteen banned abortion except for certain limited circumstances, like rape, incest, or when the life of the mother was in danger. That means forty-six out of fifty states had a ban on abortion at the time *Roe v. Wade* was decided.⁸

On January 22, 1973, with the opinion in *Roe v. Wade*, the Supreme Court of the United States invalidated the abortion laws of all fifty states and made the procurement of an abortion a constitutional right.⁹ But in so doing, the Court removed this important moral and legal issue from the hands of the voters. In his *Dobbs* opinion, Justice Alito pointed out that: “For the first 185 years after the adoption of the Constitution, each state was permitted to address this issue in accordance with the views of its citizens.”¹⁰ Because of the Supreme Court’s decision in *Roe* making abortion a constitutional right, from that point forward the debate could never be about whether it was right or wrong, and whether it should be permitted or banned. The debate could only then take place on the margins of this monumental issue: over questions of government funding, parental notification, clinic access and other lesser issues. Over these last decades, pro-abortion advocates have sought to incrementally expand access to abortion while pro-life advocates have attempted to limit or restrict abortion in any minimal way the law would allow. It was a battle over inches since the war had already been lost.



The Court in *Roe* declined to address the most important and fundamental question of all; a question

which should have been a prerequisite to rendering any decision regarding abortion whatsoever: the question of when a human life begins. In fact, the Court rather contemptuously stated: “We need not resolve the difficult question of when life begins. When those trained in the respective disciplines of medicine, philosophy, and theology are unable to arrive at any consensus, the judiciary, at this point in the development of man’s knowledge, is not in a position to speculate as to the answer.”¹¹

That conclusion was factually wrong at the time and it is wrong now. There is simply no question that human embryos and fetuses are living human organisms at the earliest stage of development. The real question raised about abortion — a question that the Supreme Court was unable to face — is whether a human being at that earliest stage of development is a human life that should be respected. And then the Supreme Court compounded its error.

Once having admitted it somehow could not render a decision on whether an unborn child in the womb was even a human life, the Court had a moral and a judicial obligation to step away from any decision whatsoever. If the Court was unable to answer that question itself, then why, under our Constitution, did it have any business instructing states as to what answers they were allowed to give?

In his famous dissent in the companion case to *Roe*, another abortion case named *Doe v. Bolton*, Justice Byron White stated that the subject of whether abortion should be legal “for the most part, should be left with the people and the political processes the people have devised to govern their affairs.”¹² That is, after all, how our Constitutional system works. He also termed the Court’s decision in *Roe* the “exercise of raw judicial power.”¹³ Justice White was correct on both counts. This is the system the Framers of the Constitution gave us in 1787. The most important decisions in our American political life should always be decided by the people, unless the Constitution *explicitly* says differently. The Supreme Court is meant to safeguard the Constitution and protect the laws duly enacted by the people through their elected representatives. The Framers never intended that the Supreme Court should legislate over the will of the people and apart from the legislative process the Constitution established.

In President Lincoln’s famous formulation, we have a government “of the people, by the people and for the people”,¹⁴ not “of the Court, by the Court and for the Court”.

In *Roe v. Wade*, abortion in America was forced on our nation against the will of the people in forty-six of the fifty states of the Union at the time it was handed down. Because of this it has roiled American politics ever since. It has become one of the greatest and most contentious moral questions in politics since the issue of slavery. The decision rendered in *Dobbs v. Jackson* was prompted by twenty-six states (a majority) “expressly ask[ing] this Court to overrule *Roe* ... and allow the States to regulate or prohibit pre-viability abortions.”¹⁵

This decision will no doubt agitate American politics and inflame public opinion even further than it has been in recent years over this and other volatile issues. But this decision is fundamentally different, precisely because it does not *impose* anything on our country, but instead *returns* this important question into the hands of the American people.

Justice Blackman, the author of the opinion in *Roe*, claimed that experts in medicine, philosophy, theology and law could not decide on when human life begins. That is not true. But, even if it were, what Justice Blackman forgot, or perhaps just disregarded, was that in our system, when the experts cannot agree on something the decision must be left to the people.

The famous journalist and Catholic convert, G. K. Chesterton, wrote that the English Common Law, upon which our system of laws is based, had wisely decided that whenever society has something of the greatest importance to do, it does not turn to the specialists. Rather, “it collects twelve of the ordinary men standing round. The same thing was done, if I remember right, by the Founder of Christianity.”¹⁶

In the United States this right to trial by jury is guaranteed by the Sixth Amendment to the Constitution, part of the Bill of Rights. For the last 231 years it has been our practice that all have the right to be judged by a jury of their peers, because of our belief that the judgment of ordinary citizens is most likely to produce the justice the law desires. And laws themselves are enacted by legislators who are elected by the people.

Nothing in the Constitution even hints that we should be governed by unelected justices and judges. Yet that is precisely what *Roe v. Wade* did.

This is why the decision of the Court in *Dobbs* is of such great importance as a legal and political matter: it places this important issue of abortion before the judgment of ordinary citizens, who now have the right, and also the responsibility, to make a decision.

As the Catholic Church, founded by Jesus Christ, and guided by the Holy Spirit over these past twenty centuries, we do not believe that we can ever vote to overturn God's Law. We can only vote to ratify it. But now, thanks to the decision in *Dobbs v. Jackson*, we have the opportunity for the first time in half a century to make the case for God's Law, to participate in the debate in the public square and to help our fellow citizens understand that now there are only two ways that lie before us.

II. The Two Ways

"There are two ways, one of life and one of death, but a great difference between the two ways."¹⁷

These words form the opening sentence of the text of the *Didache* (a Greek term meaning "teaching"), a first-century Christian text also known as "The Lord's Teaching Through the Twelve Apostles to the Nations." It is an early Christian manual on morals and Church practice. Because it was written in the same century in which Our Lord Jesus Christ lived and taught, and because it was accepted by the Fathers of the Church, it is considered to be the first summary of what Christians believed and how they were to live as handed on by the Apostles from the teaching of Jesus Christ Himself.

The *Didache* contains a section on forbidden "grave sins", and it states: "You shall not commit murder, ... you shall not murder a child by abortion nor kill that which is born." It goes on to define the "Way of Death", and condemns not only the sin of murder, but explicitly condemns the "murderers of children."¹⁸

This means that our earliest ancestors in the Faith, who had received the teachings of Jesus from His Apostles themselves, knew, understood and believed that abortion was a terrible sin and could **never**



be permitted. While this was an explicitly Christian teaching, it was not Christians only who believed it. Indeed, four-hundred years before Our Lord's birth, the Greek physician Hippocrates, known as the "Father of Medicine", formulated his famous oath which includes this promise: "I will give no deadly medicine to any one if asked, nor suggest any such counsel; and in like manner I will not give to a woman a pessary to produce abortion."¹⁹ Unfortunately, today when students in America take the Hippocratic Oath upon graduation from medical school, this promise has been carefully excised from the text.

As the modern world has nearly universally capitulated to accepting abortion, the Catholic Church, from the time of Our Lord and the teaching of his Apostles to the present, has consistently taught that abortion is a grave evil and a terrible sin. The *Catechism of the Catholic Church*, produced during the pontificate of Pope St. John Paul II states:

Human life must be respected and protected absolutely from the moment of conception. From the first moment of his existence, a human being must be recognized as having the rights of a person- among which is the inviolable right



of every innocent being to life ... Since the first century the Church has affirmed the moral evil of every procured abortion. This teaching has not changed and remains unchangeable. Direct abortion ... is gravely contrary to the moral law.²⁰

The *Catechism* goes on to quote the 1965 document *Gaudium et spes*, the *Pastoral Constitution on the Church in the Modern World*, from the Second Vatican Council:

God, the Lord of life, has entrusted to men the noble mission of safeguarding life, and men must carry it out in a manner worthy of themselves. Life must be protected with the utmost care from the moment of conception: abortion and infanticide are abominable crimes.²¹

As Catholics, we believe that from the moment of conception a human life is created by the child's parents and an immortal soul is created directly by God. Therefore, there can be no such thing as an unwanted child, since every child in the womb and beyond has been directly and uniquely created and willed into existence by Almighty God. From the moment of conception, through birth, throughout a person's entire life, and to the very moment of death, human life is

sacred because it remains in a "special relationship with the Creator, who is its sole end."²²



In 1994, Mother Teresa of Calcutta had her lawyers file an amicus brief with the Supreme Court of the United States urging it to recognize an unborn child's inalienable right to life. It is thought to be the only time Mother Teresa ever formally petitioned a government. Her legal brief was written in her own powerful words:

America needs no words from me to see how your decision in *Roe vs. Wade* has deformed a great nation. The so-called right to abortion has pitted mothers against their children and women against men. It has sown violence and discord at the heart of the most intimate human relationships. It has aggravated the derogation of the father's role in an increasingly fatherless society. It has portrayed the greatest of gifts — a child — as a competitor, an intrusion and an inconvenience ... Human rights are not a privilege conferred by government ... They are every human being's entitlement by virtue of his humanity. The right to life does not depend, and must not be contingent, on the pleasure of anyone else, not even a parent or sovereign ... You must weep that your own government, at present, seems blind to this truth.²³

In recent times, Pope Francis has spoken out repeatedly in the most forceful (and sometimes even startling) terms on the absolute impermissibility of abortion:

Abortion is not the lesser of two evils. It is a crime. It is to throw someone out in order to save another. That's what the Mafia does. It is a crime, an absolute evil. Abortion is not a theological problem. It is a human problem. It is a medical problem. You kill one person to save another ... It's against the Hippocratic oaths doctors must take. It is an evil in and of itself.

And, in his papal Encyclical, *Laudato sí*, Pope Francis wrote that the respect for creation and human dignity must go hand in hand:

Since everything is interrelated, concern for the protection of nature is also incompatible with the justification of abortion. How can we genuinely teach the importance of concern for other vulnerable beings, however troublesome or inconvenient they may be, if we fail to protect a human embryo, even when its presence is uncomfortable and creates difficulties?²⁴

Just eight years after the Second Vatican Council taught, yet again, that abortion was a sin and an "abominable crime", the Supreme Court of the United

States would summarily legalize abortion across the country. And so, in the aftermath of *Roe v. Wade* in America, and with the beginnings of the legalization of abortion in nations all around the globe, Pope St. Paul VI issued a document which explained:

The right to life is no less to be respected in the small infant just born than in the mature person. In reality, respect for human life is called for from the time that the process of generation begins. From the time that the ovum is fertilized, a life is begun which is neither that of the father nor of the mother, it is rather the life of a new human being with his own growth. It would never be made human if it were not human already.²⁵

The document then went on to explain the role of the State in not only the preservation of rights but also to make sure that the laws it passes conform to God's Eternal Law:

It is at all times the task of the State to preserve each person's rights and to protect the weakest ... The law ... cannot act contrary to a law which is deeper and more majestic than any human law: the natural law engraved in men's hearts by the Creator as a norm which ... it is always wrong to contradict. Human law ... cannot declare to be right what would be opposed to the natural law, for this opposition suffices to give the assurance that a law is not a law at all. It must in any case be clearly understood that whatever may be laid down by civil law in this matter, man can never obey a law which is in itself immoral, and such is the case of a law which would admit in principle the liceity of abortion. Nor can he take part in a propaganda campaign in favor of such a law, or vote for it.²⁶

The Declaration of Independence, our great founding document states: "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness."²⁷ In this second sentence of the Declaration, the Founding Fathers set forth these foundational principles: God has created all human beings; He has created them equal; and God has granted to all certain unalienable rights, which can neither be

taken away nor given up. And, most especially, the Declaration places the first and preeminent “Right” as the “Right to Life”.

However, *Roe* and the other cases which followed it ignored this first “unalienable right”. The Catholic Church has always understood that this is not only morally impermissible, but it is detrimental to civil society and a grave threat the political order as well. As the *Catechism* puts it:

The inalienable right to life of every innocent human individual is a constitutive element of a civil society and its legislation ... When the state does not place its power at the service of the rights of each citizen, and in particular of the more vulnerable, the very foundations of a state based on law are undermined.²⁸

Therefore, it should be clear that the Catholic Church, from the time of Jesus and the Apostles through all the centuries to the present, has consistently taught that abortion is a grave sin and is always morally wrong.

In the modern world the Church, along with many of our other Christian brethren, as well as those from other religious traditions and from none, has been like St. John the Baptist: a “voice of one crying in the wilderness”.²⁹ The Church also recognizes that when the State arrogates to itself powers that violate the rights and dignity of the human person, it places its own very existence in jeopardy. A nation that contravenes God’s Law will not be able to preserve or enforce its own laws. And, when the Rule of Law ceases to exist, so does the State.

This is the situation we find ourselves in today. The moral law has broken and the civil law has broken, and with good cause people are now afraid. They fear for themselves, for their families and for their country. There is a growing — and not inaccurate — sense that we have lost our way, that somehow we have taken the wrong path. It is at this historic moment that we must return to that basic truth articulated two-thousand years ago: “There are two ways, one of life and one of death, but a great difference between the two ways.”³⁰

No one knew this better than Pope St. John Paul the Great. In many ways he was a prophet. He began



his pontificate in 1978 by telling the world: “Do not be afraid!”³¹ The world did not seem to understand then just how much there was to be afraid of. But the Holy Pope from Poland, who had suffered most of his life living under two different totalitarian regimes, knew very well that there are only two ways, “one of life and one of death”.

Recognizing this, in 1995 Pope St. John Paul wrote his great Encyclical *Evangelium vitae*, *The Gospel of Life*. In that letter he explained to the people of the Church and, indeed, of the world, that every person must recognize:

... that we are facing an enormous and dramatic clash between good and evil, death and life, the “culture of death” and the “culture of life”. We find ourselves not only “faced with” but necessarily “in the midst of” this conflict: we are all involved and we all share in it, with the inescapable responsibility of choosing to be

unconditionally pro-life.

For us too Moses' invitation rings out loud and clear: "See, I have set before you this day life and good, death and evil ... I have set before you life and death, blessing and curse; therefore choose life, that you and your descendants may live" (Dt 30:15, 19). This invitation is very appropriate for us who are called day by day to the duty of choosing between the "culture of life" and the "culture of death".³²

Pope St. John Paul was a theologian of the "two ways", and a true spiritual father and pastor who sought to lead his children from the wrong to the right path before it was too late. It is even later now than it was then.

III. Where Are We Going?

There is a well-known story about St. Peter in Rome that dates from Apostolic times. Pope St. John Paul II retold the story in his first homily that inaugurated his pontificate.³³ When St. Peter, after many years leading the Church in Rome, was fleeing persecution and certain death, he left the city by traveling along the Appian Way.



At a certain point, about a mile outside the city's walls, he had a vision of the Lord Jesus walking towards him in the opposite direction. But the vision was not of the Lord Jesus of the Mount of the Beatitudes, or the Lord of the miracles on the hillsides of Galilee, or even the Lord of the Last Supper; the vision that met Peter's eyes was that of the Lord of the Passion, the Lord of Good Friday. Jesus wore the scarlet Robe and the Crown of Thorns, and He carried the Cross of wood on His back. St. Peter, in astonishment, asked: "*Quo vadis, Domine?*", meaning, "Where are you going, Lord?" To which the Lord replied: "I am going to Rome to be crucified again!" Peter then understood. It was not the Lord's responsibility to be crucified again, it was Peter's. He was the shepherd, and his flock was alone and untended back in the city he was fleeing. Perhaps in that moment he recalled the words the Lord had spoken to him on the shore of the Sea of Galilee following the Resurrection some thirty years before: "Truly, truly, I say to you, when you were young, you girded yourself and walked where you would; but when you are old, you will stretch out your hands, and another will gird you and carry you where you do not wish to go."³⁴

It is said that on that spot Peter turned and made his way back into the city of Rome where he suffered crucifixion on the Vatican hill, in the place where the Basilica of St. Peter's now stands. A small church also stands on the spot where St. Peter turned back.

The great architect of American Independence, John Adams, wrote that "Our Constitution was made only for a moral and religious People. It is wholly inadequate to the government of any other."³⁵ Why did Adams believe this? Professor Robert George of Princeton University provides the answer:

Because a people lacking in virtue could be counted on to trade liberty for protection, for financial or personal security, for comfort, for being looked after, for being taken care of, for having their problems solved quickly. And there will always be people occupying or standing for public office who will be happy to offer the deal — an expansion of their power in return for what they can offer by virtue of that expansion.³⁶

As we as a nation have fallen away from the practice of religion, we have fallen away from the practice and

the pursuit of virtue. Because of this, we have taken the path of least resistance in so many things for so long, that we cannot now do the hard things even when we know we must.

However, now we have been given a great opportunity. The repeal of *Roe* has taken the great moral question of our times, which has been out of our reach for half a century, and has placed it once again in our hands. It is at once an opportunity but also a profound responsibility.

The decision in *Dobbs* marks only the end of the beginning of the battle to return our nation to following God's Law. But we cannot do this by imposing our will on others, as was done to us. We must fulfill this Great Commission of Jesus in the same way that the Apostles fulfilled theirs: by preaching the Truth of the Gospel of Life to our fellow citizens and persuading them to vote in favor of Life.

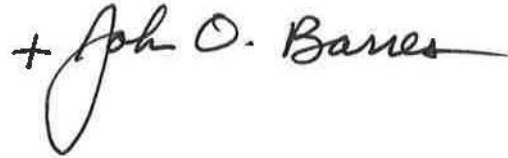
The battle will no longer be a march every January 22nd to stand in front of a Courthouse built of marble. It will take place in every village and town and city and state capital. It will take place in the homes and in the schools and in the communities in which we live as Americans all across our land. We must preach the Gospel of Life in the midst of the Culture of Death and not be afraid. We must do so with courage and conviction but also with charity and love, especially for those who "know not what they do."³⁷

We have seen for too long what lies down the path of the Culture of Death. It is not only alienation from God, estrangement from each other, but also a threat to the very existence of our nation itself. We must have more Faith in God than fear of the future. Pope Francis has said: "Every child who, rather than being born, is condemned unjustly to being aborted, bears the face of Jesus Christ, bears the face of the Lord, who even before he was born, and then just after birth, experienced the world's rejection."³⁸ We cannot continue to reject the Lord and His Law any longer. God has given us this chance at this precise moment in history to make amends for the past and to atone for our sins, by turning from the Way of Death and setting forth on the Way of Life.

With this recent Supreme Court decision, we have come to the fork in the road. "There are two ways, one

of life and one of death, but a great difference between the two ways."³⁹ The God who made us, and who made all things, stands with His Cross at the diverging of the paths and asks us a simple question: "*Quo vadis, America?*"

Sincerely yours in Christ,

A handwritten signature in black ink that reads "+ John O. Barres". The signature is written in a cursive style with a large, looping initial 'J'.

Most Reverend John O. Barres
Bishop of Rockville Centre

Endnotes

- 1 *Quo Vadis, America?* was the title of a television program by Archbishop Fulton J. Sheen in the 1960's on the topic of the virtue of patriotism. The Latin phrase, *quo vadis*, means "where are you going?"
- 2 Alexander Roberts & James Donelson, transl., *The Didache*, retrieved at: www.earlychristianwritings.com/text/didache-roberts.html (accessed June 22, 2022).
- 3 *Jane Roe, et al., v. Henry Wade, District Attorney of Dallas County*, 410 U.S. 113 (1973). In *Dobbs*, the Court also overruled *Planned Parenthood of Southeastern Pennsylvania v. Casey*, 505 U.S. 883 (1992), which overruled *Roe* in part, but this letter will not address the complexities of that decision or other cases which are the progeny of *Roe*.
- 4 *Thomas E. Dobbs, State Health Officer of the Mississippi Department of Health, et al., Petitioners v. Jackson's Women's Health Organization, et. al.*, 597 U.S. ___ (2022).
- 5 *Dobbs*, opinion by Justice Samuel Alito, 6.
- 6 Julia Jacobs, "Remembering an Era Before Roe, When New York Had the 'Most Liberal' Abortion Law", *The New York Times*, July 18, 2018, retrieved at: www.nytimes.com/2018/07/19/us/politics/new-york-abortion-roe-wade-nyt.html (accessed June 22, 2022).
- 7 Rachel Benson Gold, "Lessons From Before Roe: Will Past Be Prologue?", Gutmacher Policy Institute, Vol. 6, Issue 1 (2003), retrieved at: www.gutmacher.org/gpr/2003/03/lessons-roe-will-past-be-prologue (accessed June 22, 2022).
- 8 *Dobbs*, opinion by Justice Samuel Alito, 2.
- 9 *Ibid.*
- 10 *Ibid.*, 1.
- 11 *Roe*, 410 U.S. 113 at 159 (1973).
- 12 *Doe v. Bolton*, 410 U.S. 179 at 222 (1973), stating: "This opinion applies also to No. 718, *Roe v. Wade*, ante p. 410 U.S. 113."
- 13 *Ibid*, 222.
- 14 Abraham Lincoln, "The Gettysburg Address" (1863), retrieved at: www.loc.gov/resource/rbpe.24404500/?st=text (accessed, June 22, 2022).
- 15 *Dobbs*, opinion by Justice Samuel Alito, 4.
- 16 G.K. Chesterton, *Tremendous Trifles*, 1909, retrieved at: www.gutenberg.org/files/8092/8092-h/8092-h.htm#link2H_4_0012 (accessed June 22, 2022).
- 17 Roberts & Donelson, *The Didache*.
- 18 *Ibid.*
- 19 Hippocrates, "The Hippocratic Oath" (400 B.C.), retrieved at: www.britannica.com/topic/Hippocratic-oath (accessed June 22, 2022).
- 20 *Catechism of the Catholic Church*, 2270-2271 (1992), retrieved at: www.vatican.va/archive/ENG0015/P7Z.HTM#-2CA (accessed June 22, 2022).
- 21 "Gaudium et spes", 51 (1965), retrieved at: www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_const_19651207_gaudium-et-spes_en.html (accessed June 22, 2022).
- 22 Congregation for the Doctrine of the Faith, "Donum Vitae, Instruction of Respect for Human Life in Its Origin and on the Dignity of Procreation, Replies to Certain Questions of the Day", 5 (1987), retrieved at: www.vatican.va/roman_curia/congregations/cfaith/documents/rc_con_cfaith_doc_19870222_respect-for-human-life_en.html (accessed June 22, 2022).
- 23 Mother Teresa of Calcutta, "Mother Teresa Takes Pro-Life Message to the Supreme Court" (1994), retrieved at: www.ewtn.com/catholicism/library/mother-teresa-takes-prolife-message-to-the-supreme-court-2701 (accessed June 22, 2022).
- 24 Pope Francis, "Laudato si'", 120 (2015) retrieved at: www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html (accessed June 22, 2022).
- 25 Sacred Congregation for the Doctrine of the Faith, "Declaration on Procured Abortion", 12 (1974), retrieved at: www.vatican.va/roman_curia/congregations/cfaith/documents/rc_con_cfaith_doc_19741118_declaration-abortion_en.html (accessed June 22, 2022). This document also contains an excellent summary of the Church's consistent teaching though the centuries on the evil of abortion.
- 26 *Ibid.*, 21-22.
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