

LEGAL EFFORTS TO OUTLAW BIBLICAL COUNSELING: How Bans on Conversion Therapy Are Being Used Against Christian Discipleship

Todd M. Sorrell¹

THE COLLISION

Justice is turned back, and righteousness stands far away; for truth has stumbled in the public squares, and uprightness cannot enter. Truth is lacking, and he who departs from evil makes himself a prey. (Isaiah 59:14-15)

Approximately 6,000 years ago, God created all things (Genesis 1:1; Revelation 4:11). In that process, God created mankind, male and female, and designed them to join in physical union as husband and wife (Genesis 1:27, 2:21-24; Matthew 19:4-5). Over the course of the following 4,000 years, God made it clear that sexuality falling outside of the bounds of marriage constituted grievous sin, worthy of condemnation and wrath (see Exodus 20:14; Luke 16:18). God provided further clarity by specifying that homosexuality and cross-dressing are detestable and shameful sins, worthy of death (Genesis 19:1-29; Leviticus 18:22, 20:13; Deuteronomy 22:5; Romans 1:26-27; 1 Corinthians 6:9; 1 Timothy 1:10; Jude 7). In other words, God made sexually deviant behavior against His law. Approximately 2,000 years ago, when Jesus ascended from earth to heaven, He declared what is popularly known as the Great Commission when He instructed His followers to, “Go therefore and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, teaching them to observe all that I have commanded you” (Matthew 28:19-20).²

¹ Todd M. Sorrell is a California attorney, author, businessman, and adjunct professor of biblical counseling and business. Please contact jbsc@biblicalcounseling.com with questions for the author.

² Unless otherwise noted, all Scripture quotations are taken from the Legacy Standard Bible.

On January 7, 2022—approximately 6,000 years after creation and the original marriage between one man and one woman, and approximately 2,000 years after the Lord Jesus Christ made it clear that true Christians will teach others to obey God, including His commandments against sexual perversion—Canadian Federal Bill C-4 took effect which criminalizes “conversion therapy.” This Bill defines conversion therapy so broadly as to prohibit any practice designed to help an individual put off homosexual, transsexual, or transgender practice or attraction.³ Also in 2022, the City of West Lafayette, Indiana, proposed Ordinance 31-21 which sought to ban “unlicensed counselors” from practicing “conversion therapy” on minors, enforced by a \$1,000 fine for each violation.⁴ This ordinance included a similarly broad definition of prohibited behavior, directed toward those who would seek to help individuals shed or change homosexual and other sexually deviant practices and attitudes. To put it bluntly, these laws seek to criminalize the fulfillment of the Great Commission. They outlaw obedience to God.

In light of this collision between God’s law and man’s law, those calling themselves Christians must make a decision. Either they jettison the Christian label (which means “follower of Christ”) or they choose to “obey God rather than men” (Acts 5:29). Otherwise, claiming to know God but refusing to keep His commands means that one “is a liar, and the truth is not in him” (1 John 2:4). They will be banished from God’s presence for eternity, cast into darkness where there will be weeping and gnashing of teeth (Matthew 7:21-23; 8:12).

For those true Christians who seek to fulfill the Great Commission by way of discipleship and biblical counseling, they should prepare themselves for persecution. Indeed, the two laws referenced above (the first one in effect and the second one proposed and later withdrawn) illustrate the current and coming worldwide legislative attacks on biblical Christianity and, specifically, against biblical counseling. Restrictions on so-called conversion therapy exist in at least

³ “Canada: Bill C-4 Banning Conversion Therapy Comes into Force,” *The Library of Congress*, <https://www.loc.gov/item/global-legal-monitor/2022-01-19/canada-bill-c-4-banning-conversion-therapy-comes-into-force/>; *Government Bill (House of Commons) C-4 (44-1) - Royal Assent - an Act to Amend the Criminal Code (Conversion Therapy)*, Parliament of Canada, 8 Dec. 2021, <https://www.parl.ca/DocumentViewer/en/44-1/bill/C-4/royal-assent>.

⁴ “West Lafayette Ordinance 31-21,” *Lafayette Citizens for Freedom*, 2022, <https://www.freedomlafayette.org/issues/wl-ordinance-31-21>; City of West Lafayette, “Ordinance No. 31-21 (Amended),” *Internet Archive*, https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/1163135/Ord_31-21_Ban_Conversion_Therapy_Amended_.pdf.

14 countries and countless provinces, states, and cities around the world.⁵ It is anticipated that the number of laws targeting this practice will only increase as the LGBTQ voices likewise increase in volume and gain further worldly acceptance. But is knowing that persecution is coming the only thing that biblical counselors can do? Does God provide any guidance as to how Christians should respond to these threats against the practice of true religion? The following discussion will provide a brief summary of these evil legislative attacks, a warning about other potential areas where biblical counselors may be persecuted, and how to plan ahead and best prepare to withstand the coming days. As the Apostle Paul states in his letter to the Ephesian church where he charges them to put on the whole armor of God, the goal is to “withstand in the evil day, and having done all, to stand firm” (Ephesians 6:13).

DANGEROUS DEFINITIONS

Scripture is replete with warnings about speech. God calls man to be slow to speak (James 1:19), to set a guard over his mouth (Psalm 141:3), to be constructive (Ephesians 4:29), to be gentle (Proverbs 15:4), to be healing (Proverbs 12:18), to be pure (Ephesians 5:4), to be careful (Matthew 12:36-37), and to speak truth in love (Ephesians 4:15). Satan, on the other hand, is the “father of lies” (John 8:44) and is the great deceiver (2 Corinthians 11:3; Revelation 12:9). From his very first interaction with humans, Satan redefined what God had said, calling evil good (Genesis 3:1-5). His pattern continues to this day.

Specifically, Satan has more recently been engaged in an attempt to redefine what biblical counseling is vis-à-vis the secular and misguided psychotherapeutic practice of conversion therapy. The term “conversion therapy” (sometimes known as “reparative therapy”) has long carried a negative connotation not only among the LGBTQ community and its supporters, but also among biblical counselors. As historically defined and practiced, conversion therapy is an unbiblical method of trying to change outward homosexual behavior and attraction. One popular premise behind the practice seeks to define homosexuality as a curable “disease,”

⁵ Stonewall Staff, “Which Countries Have Already Banned Conversion Therapy?” *Stonewall*, 1 Apr. 2022, <https://www.stonewall.org.uk/about-us/news/which-countries-have-already-banned-conversion-therapy>.

thus seeking to redirect unbiblical homosexual desire *without* reorienting the heart toward loving God and desiring His glory. Certain aspects of secular conversion therapy have been described by one biblical counseling leader as constituting a “barbaric approach” to changing unwanted sexual desire, relying on unproven practices such as hypnosis and even going so far as to include behaviorism strategies like attaching electrical wires to an individual’s genitalia and delivering shock treatment when the person is inappropriately aroused.⁶ There are even more extreme aversion approaches, such as sick practitioners actually raping young men as part of this “therapy” to make them hate men and the desire for anal sex.⁷ Needless to say, such a “therapy” is not found on the pages of Scripture.⁸

If the term was used in its historic sense, Christians could perhaps align themselves with laws that prohibit the practice. But that is not what is happening. The problem for biblical counselors is that those in opposition to God’s Word are now using the term “conversion therapy” but defining it to include ordinary, biblical discipleship. There are definitions that are simple and broad, such as that used by the American Academy of Child and Adolescent Psychiatry which describes it as “interventions purported to alter same-sex attractions or an individual’s gender expression with the specific aim to promote heterosexuality as a preferable outcome.”⁹ Then there are specific and detailed definitions that go on for hundreds of words and subparts that rope in all sorts of practices, including Christian counseling. One example is Canadian Bill C-4 (discussed in detail below). With this in mind, the definitional section of a statute is where Christians

⁶ Steve Viars, “Conversion Therapy Bans – Coming to a Theater near You,” *Biblical Counseling Coalition*, 15 Apr. 2022, <https://www.biblicalcounselingcoalition.org/2022/04/15/conversion-therapy-bans-coming-to-a-theater-near-you/>; Ignatius Yordan Nugraha, “The Compatibility of Sexual Orientation Change Efforts with International Human Rights Law,” *Netherlands Quarterly of Human Rights*, vol. 35, no. 3, Sept. 2017, pp. 176–192, doi:10.1177/0924051917724654.

⁷ Kori Cordero and Vanessa Carlisle, “Banning Conversion Therapy on Minors: A Guide for Creating Tribal and State Legislation,” American Bar, American Bar Association, Feb. 2019, https://www.americanbar.org/content/dam/aba/administrative/sexual_orientation/banning-conversion-therapy-legislative-guide.pdf.

⁸ Historically, conversion therapy has been separated into two categories—aversion therapy and talk therapy. While aversion therapy (electric shocks, for example) is always problematic, and talk therapy may not be helpful if not biblically directed, it is easy to understand a qualitative difference between the two categories. LGBTQ proponents often group them together as if Christian speech is as dangerous as physical abuse in the counseling room.

⁹ “Conversion Therapy,” *Conversion Therapy*, American Academy of Child & Adolescent Psychiatry, 2018, https://www.aacap.org/aacap/Policy_Statements/2018/Conversion_Therapy.aspx.

need to first direct their attention. More precisely, when faced with proposed legislation that purports to ban conversion therapy but, in reality, seems to ban biblical counseling, Christians must read and focus on the actual language of the law. Well-informed believers should not rely just on headlines or descriptions offered by others as substitutes for a personal understanding of what is being legislated. Only then can it be determined whether any particular law should be opposed and how far Christians should go in pushing back against it.

UNGODLY LAWS

International

In 1999, Brazil became the first country to ban conversion therapy.¹⁰ It then spread to places like Taiwan, Argentina, and Germany.¹¹ As mentioned above, Canada implemented a broad ban in early 2022, and France and New Zealand enacted similar prohibitions shortly thereafter.¹² While a number of these bans appear to restrict licensed health care practitioners from engaging in the practice with minors, it is clear from the Canadian Bill that the end goal is to close off *all* efforts to change homosexual/transsexual/transgender behavior and attraction, whether those efforts come from a licensed individual or not, or whether they are directed toward minor counselees or adults.

Canadian Bill C-4 passed without opposition and the preamble to that Bill states that it is a “myth” to believe that “heterosexuality, cisgender gender identity

¹⁰ Stonewall Staff, “Which Countries Have Already Banned Conversion Therapy?” *Stonewall*, 1 Apr. 2022, <https://www.stonewall.org.uk/about-us/news/which-countries-have-already-banned-conversion-therapy>. The Brazil ban includes the overbroad definition that prohibits licensed therapists from attempting to reverse, adjust, or reorient those engaging in sexual sin, including homosexuals, transsexuals, and transvestites. See Conselho Federal de Psicologia, “Resolução N° 1,” CFP, 29 Jan. 2018, <https://site.cfp.org.br/>; IBDFAM Staff, “STF Extingue Definitivamente Ação Contra Conselho Federal De Psicologia Que Buscava Regularizar a ‘Cura Gay,’” IBDFAM, Instituto Brasileiro De Direito De Familia, 2020, <https://ibdfam.org.br/noticias/7315/STF+extingue+definitivamente+a%C3%A7%C3%A3o+contra+Conselho+Federal+de+Psicologia+que+buscava+regularizar+a+%22cura+gay%22%22>.

¹¹ Ibid; See also Rachel Savage, “Conversion Therapy Thrives Globally as Bans Gather Pace,” *Thomson Reuters Foundation Long Reads*, 15 Sept. 2021, <https://longreads.trust.org/item/lgbt-conversion-therapy-global-bans> (“Anyone carrying out conversion therapy on under-18s in Germany, or coercing, deceiving or threatening adults into it, risks a year in prison. Advertising or offering conversion therapy carries a 30,000 euro (\$35,535) fine.”).

¹² Ibid.

and gender expression that conforms to the sex assigned to a person at birth are to be preferred over other sexual orientations, gender identities and gender expressions.”¹³ This sounds remarkably similar to Satan’s preamble to Eve eating from the forbidden fruit: “Did God actually say, ‘You shall not eat of any tree in the garden?’” (Genesis 3:1). In other words, the serpent called God’s command a myth, something not to be believed. Bill C-4 does the same thing.

Bill C-4 defines “conversion therapy” as follows:

[C]onversion therapy means a practice, treatment or service designed to (a) change a person’s sexual orientation to heterosexual; (b) change a person’s gender identity to cisgender; (c) change a person’s gender expression so that it conforms to the sex assigned to the person at birth; (d) repress or reduce non-heterosexual attraction or sexual behaviour; (e) repress a person’s non-cisgender gender identity; or (f) repress or reduce a person’s gender expression that does not conform to the sex assigned to the person at birth.

For greater certainty, this definition does not include a practice, treatment or service that relates to the exploration or development of an integrated personal identity — such as a practice, treatment or service that relates to a person’s gender transition — and that is not based on an assumption that a particular sexual orientation, gender identity or gender expression is to be preferred over another.¹⁴

With this definition in mind, Bill C-4 establishes the following as indictable criminal offenses (akin to felonies in the United States): (1) Knowingly causing another person to undergo conversion therapy or providing such therapy (punishable by up to five years’ imprisonment); (2) knowingly promoting or advertising conversion therapy (punishable by up to two years’ imprisonment);

¹³ “Canada: Bill C-4 Banning Conversion Therapy Comes into Force,” *The Library of Congress*, <https://www.loc.gov/item/global-legal-monitor/2022-01-19/canada-bill-c-4-banning-conversion-therapy-comes-into-force/>; *Government Bill (House of Commons) C-4 (44-1) - Royal Assent - an Act to Amend the Criminal Code (Conversion Therapy)*, Parliament of Canada, 8 Dec. 2021, <https://www.parl.ca/DocumentViewer/en/44-1/bill/C-4/royal-assent>.

¹⁴ *Ibid.*

and (3) receiving a financial or other material benefit, knowing that it is obtained or derived directly or indirectly from the provision of conversion therapy (punishable by up to two years' imprisonment).¹⁵

To further the impact that this anti-biblical law will have, Canada's federal government also amended the law to allow courts to order that any advertisements for conversion therapy be deleted from the internet. Notably, this law is found in the very same Canadian Criminal Code section that governs the distribution of child pornography.¹⁶ Finally, Bill C-4 also amended another Criminal Code section to now criminalize the removal of minors from Canada for the purpose of subjecting them to conversion therapy abroad (an indictable offense subjecting the violator to up to five years' imprisonment).¹⁷

Canada's law may be the most comprehensive to date, but it certainly will not be the last effort to criminalize biblical counseling on issues of sexuality. As one LGBTQ advocacy organization has stated in its push for such a ban in the UK by the Fall of 2022, "We have the opportunity to secure a legislative ban which makes conversion therapy illegal: Wherever it occurs—in public or private, through healthcare or religious and cultural interventions."¹⁸ To go one step further, efforts are underway to redefine Christian practice as akin to torture. In fact, the argument is already being made that all sexual orientation change efforts are cruel, degrading, and inhumane, in violation of international human rights laws such as the International Convention on Civil and Political Rights and the Convention against Torture.¹⁹

¹⁵ Each of these also may be punished on summary conviction, which is akin to a misdemeanor in the United States. *Ibid.*

¹⁶ Legislative Services Branch, "Consolidated Federal Laws of Canada, an Act to Amend the Criminal Code (Conversion Therapy)," *An Act to Amend the Criminal Code (Conversion Therapy)*, Justice Laws Website, 8 Dec. 2021, https://laws-lois.justice.gc.ca/eng/AnnualStatutes/2021_24/FullText.html; "Canada: Bill C-4 Banning Conversion Therapy Comes into Force," *The Library of Congress*, <https://www.loc.gov/item/global-legal-monitor/2022-01-19/canada-bill-c-4-banning-conversion-therapy-comes-into-force/>; *Government Bill (House of Commons) C-4 (44-1) - Royal Assent - an Act to Amend the Criminal Code (Conversion Therapy)*, Parliament of Canada, 8 Dec. 2021, <https://www.parl.ca/DocumentViewer/en/44-1/bill/C-4/royal-assent>.

¹⁷ *Ibid.*

¹⁸ "Ban Conversion Therapy," *Ban Conversion Therapy*, <https://www.banconversiontherapy.com/>.

¹⁹ Ignatius Yordan Nugraha, "The Compatibility of Sexual Orientation Change Efforts with International Human Rights Law," *Netherlands Quarterly of Human Rights*, vol. 35, no. 3, Sept. 2017, pp. 176–192, doi:10.1177/0924051917724654; Wansong Harley, "The Constitutionality

United States

In 2012, California became the first state to prohibit state-licensed mental health professionals from practicing conversion therapy on minors.²⁰ New Jersey was next in 2013.²¹ Many others followed to the point where approximately half of the United States have in place some sort of restriction on the practice of conversion therapy. In fact, the trend is moving so fast that there are interactive maps that track LGBTQ “progress” online in real time.²² Similar maps are available for smaller locales.

On a more local level, State College, Pennsylvania, enacted an ordinance in 2018 that outlaws conversion therapy for minors. It not only bans conversion therapy by a licensed or registered professional, but also appears to restrict any person who provides counseling, mental health, and behavioral health services as part of his professional practice.²³ That may not yet fit clergy or biblical counselors, but it is getting close. Advocates of the ban make no secret of their intentions. As one stated: “This ordinance bans conversion therapy for minors but also gives us the opportunity to bring legislation elsewhere and we’ll ban conversion therapy there, too.”²⁴

Those efforts reached West Lafayette, Indiana, by way of City Ordinance 31-21 (now withdrawn), which sought to ban “unlicensed counselors” from practicing “conversion therapy” on minors, enforced by \$1,000 fines for each violation. The proposed law defined the prohibited conduct as “any practices or treatments that seek to change an individual’s sexual orientation or gender identity, including efforts to change gender expressions or to eliminate or reduce sexual or romantic

of Conversion Therapy Bans,” *The Colleges of Law*, 27 May 2020, <https://www.collegesoflaw.edu/blog/2020/05/27/the-constitutionality-of-conversion-therapy-bans/>; Mason D. Bracken, “Torture Is Not Protected Speech: Free Speech Analysis of Bans on Gay Conversion Therapy,” 63 Wash. U. J. L. & POL’Y 325 (2020), https://openscholarship.wustl.edu/law_journal_law_policy/vol63/iss1/16.

²⁰ See Cal. Bus. & Prof. Code §§ 865-865.2.

²¹ See N.J. Stat. Ann. §§ 45:1-54-55.

²² Movement Advancement Project, “Equality Maps: Conversion Therapy Laws,” https://www.lgbtmap.org/equality-maps/conversion_therapy.

²³ “Borough of State College, PA: Conversion or Reparative Therapy for Minors,” *Borough of State College, PA Code*, 2018, <https://ecode360.com/33258772>.

²⁴ Geoff. Rushton, “State College Adopts Ordinance Banning Conversion Therapy,” *StateCollege.com*, 5 Jan. 2021, <https://www.statecollege.com/centre-county-gazette/state-college-adopts-ordinance-banning-conversion-therapy/>.

attractions or feelings toward individuals of the same gender.”²⁵ The law would have specifically allowed and not prohibited “counseling that provides assistance to a person undergoing gender transition,” or counseling related to a person’s exploration of his or her identity, “as long as such counseling does not seek to change an individual’s sexual orientation or gender identity.” In simple terms, the law would not restrict a therapist from using techniques or practices designed to aid an individual who wants to “transition” from one gender to another. It would, however, have prohibited counsel to that same individual that such a transition would be detrimental, should be avoided, and that another plan (God’s, for example) would be more beneficial. Furthermore, the preamble to the proposed law says that the city “has a compelling interest in protecting the physical and psychological well-being of minors, including lesbian, gay, bisexual, and transgender youth, and in protecting its minors against exposure to serious harms caused by conversion therapy by unlicensed persons.” Clearly, those advancing this legislation would agree with this statement by one advocacy group: “LGBTQA+ people have nothing to be ashamed of and there is nothing wrong or broken about who we are. Our sexual orientations and gender identities are diverse and should be celebrated.”²⁶ In short, the law would have prohibited any unlicensed person from providing a service or counsel to help a minor who may be struggling with homosexuality or transgender issues, and would prohibit counseling someone that such behaviors or lifestyles are wrong and must be repented of. To more fully refine how broad the reach of a law like this could be, the ordinance defined “counseling” to include “techniques used to help individuals learn how to solve problems and make decisions related to personal growth, vocational, family, and other interpersonal concerns.” Such an overbroad definition could include not only biblical counselors, but also pastors, youth leaders, teachers, coaches, and even parents.²⁷ Language matters.

²⁵ “West Lafayette Ordinance 31-21,” *Lafayette Citizens for Freedom*, 2022, <https://www.freedomlafayette.org/issues/wl-ordinance-31-21>; City of West Lafayette, “Ordinance No. 31-21 (Amended),” *Internet Archive*, https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/1163135/Ord_31-21_Ban_Conversion_Therapy_Amended_.pdf.

²⁶ “Ban Conversion Therapy,” *Ban Conversion Therapy*, <https://www.banconversiontherapy.com/>; Stonewall Staff, “Netflix’s Pray Away Shows Us the Horrors of Religious Conversion Therapy – Here’s Why We Need a Ban Without Exceptions,” *Stonewall*, 2 Aug. 2021, <https://www.stonewall.org.uk/about-us/news/netflix%E2%80%99s-pray-away-shows-us-horrors-religious-conversion-therapy-here%E2%80%99s-why-we-need>.

²⁷ “West Lafayette Ordinance 31-21,” *Lafayette Citizens for Freedom*, 2022, <https://www.freedomlafayette.org/issues/wl-ordinance-31-21>; City of West Lafayette, “Ordinance No. 31-21 (Amended),” *Internet Archive*, <https://legistarweb-production.s3.amazonaws.com/uploads/>

JUDICIAL INTERPRETATION OF U.S. LAWS

As laws in the United States continue to evolve, biblical counselors may wonder whether those laws are valid and how courts will interpret and apply them. While Christians will obey God no matter the cost, they rightly pray and hope that their ability to freely speak truth to hurting seekers will not be restricted. The following discussion will provide a brief primer on how courts in the United States interact with laws that are the subject of legal challenges brought before them.

The judicial branch in the United States is charged with interpreting laws that are enacted by the legislative arms of government. This includes reading those laws to determine what the words actually mean. Statutory interpretation presumes that lawmakers legislate with knowledge of the basic rules of statutory construction. The “plain meaning rule” requires that if the language of a statute is plain and unambiguous, it must be applied according to its terms. Ambiguity is not created solely due to definitional possibilities, but only when there is statutory ambiguity. Courts must determine whether language is being used in the ordinary, dictionary sense, or in a more narrow, specialized sense. For example, if a word or phrase is defined in the statute or in a related law, then that definition will govern. In drafting and analyzing legislation, words matter. Although sometimes there are ambiguities and a need to pull from different resources to make that determination, most courts are able to understand the meaning and intent of most laws. Once it is determined what a law intends to approve or proscribe, there remains an analysis as to whether the law is valid and enforceable.

In America, the United States Constitution is considered the highest law of the land. It is the document that stands in judgment over all other laws. If a legislative body passes a law that conflicts with the Constitution, that law is invalid.

The First Amendment to the United States Constitution reads as follows:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

attachment/pdf/1163135/Ord_31-21_Ban_Conversion_Therapy_Amended_.pdf

The Fourteenth Amendment to the United States Constitution, Section 1, reads as follows:

All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

There have been many arguments about what these provisions mean and how they should be applied, but it is well-established that these freedoms are not unlimited. For example, an individual claiming First Amendment religious protection must demonstrate that he actually holds a sincere religious belief and that the law at issue imposes a substantial burden on his free exercise of religion. Even in that situation, the Supreme Court has stated that religious freedom may still be infringed when the federal government has a compelling interest to do so in order to protect the common good and to limit the ability of people to do harm to others.²⁸

The same limitation is true for freedom of speech and expression. Some speech and expression have such low First Amendment value that they are not protected. They include things like defamation, threats, child pornography, the leaking of classified information, or even yelling “fire” in a crowded movie theater when no such danger exists. But overall, the United States has historically valued an individual’s right to free speech and expression to the point where even offensive categories are tolerated (flag burning, wearing armbands, burning crosses, negative social media posts, and certain obscenities). Further, if a government restriction is “content neutral” and does not discriminate based on a particular viewpoint, it may be allowed. As an example, the government can restrict expressions or protests that block highway traffic or that pose safety hazards because the laws are equally applied to all, without regard to the content of the expression or protest.

²⁸ Taken to an extreme, most people understand that someone cannot, in the name of religion, practice child sacrifice or claim that his religion requires him to drive 100 miles per hour in a residential neighborhood. If everyone could come up with his own “religious belief” and ignore all contrary laws, government would cease to exist.

In other words, the government in that example is *not* singling out specific protests to disallow, or singling out specific speakers from expressing themselves. The law applies across the board.

Against that backdrop, Christians typically rely upon what are commonly known as the “freedom of religion” and “freedom of speech” provisions in the First Amendment as support for the idea that the government cannot enact laws that infringe on their ability to engage in Christian worship, life, speech, and practice. LGBTQ supporters typically rely upon what are commonly known as the “due process” and “equal protection” clauses in the Fourteenth Amendment as support for the idea that the government cannot discriminate against the LGBTQ lifestyle and practices, including the right to participate fully in society as homosexual, transsexual, and transgender individuals.

But what happens when those two sides collide? What happens when a statute is enacted that prohibits discrimination against LGBTQ-identifying individuals, but a Christian baker or photographer cannot in good Christian conscience provide their services in celebration of a same-sex wedding? What happens if a Christian website designer refuses to design wedding websites for same-sex marriage celebrations? These are cases that relate to compelled speech (as well as religious freedom), since both seek to require the Christian business owners to express themselves in ways they do not want. Time will tell where and how the Supreme Court will draw the line. At present, the law is somewhat ambiguous and Christians continue to be subjected to lawsuits by LGBTQ activists seeking to enforce the laws or put these believers out of business.

But what about laws that prevent speech or historically-accepted religious practice? For purposes of this discussion, the question is whether or not the government in the United States can enact laws that *prevent* Christians (biblical counselors) from telling people scriptural truth. Certain laws against “conversion therapy,” for example, seem to include Christian discipleship in their overly broad definitions. If this is the case, the laws constitute attacks on the ability to share the gospel. They seek to prevent Christians from sharing truth with those ensnared in sin. They specifically prohibit a biblical counselor from warning a confused individual that homosexuality, transsexual behavior, and transgenderism are all sins that should be confessed and forsaken before a holy God. They are direct

attacks on religious freedom and freedom of speech, not to mention the issues they raise regarding parental authority or the ability of an individual seeking counseling to provide informed consent.²⁹

To this point, the United States Supreme Court has not definitively ruled on any such case. However, various federal courts of appeal have *upheld* state laws prohibiting *licensed* mental health practitioners from engaging in the practice of conversion therapy with minors. Rejecting First Amendment arguments and parental rights, these courts have concluded that the statutes constitute a valid exercise of the states' power to regulate the medical profession and to protect the public health and safety. The idea is that the government has a compelling interest to protect minors against what the world calls unscientific, dangerous, and ineffective practices.³⁰ One court went so far as to rule that a claim that being LGBTQ is a curable mental disorder constitutes consumer fraud, and "any expert opinion based on the initial premise that homosexuality is a mental disorder or abnormal is unreliable and . . . barred."³¹ The court based its finding on the fact that "the generally accepted scientific theory is that homosexuality is not a mental disorder and not abnormal" given the removal of homosexuality from the Diagnostic and Statistical Manual of Mental Disorders ("DSM") and the "countless organizations [that] have followed the [American Psychiatric Association's] lead in removing homosexuality from its listings of mental disorders."³²

Although the United States Supreme Court has not yet invalidated a ban on conversion therapy, many court observers believe that the Court severely undermined the legal justifications for the bans. Specifically, in *Nat'l Inst. of Family and Life Advocates v. Becerra* (NIFLA), 138 S. Ct. 2361 (2018), the Supreme

²⁹ "The First Amendment grew out an experience which taught that society cannot trust the conscience of a majority to keep its religious zeal within the limits that a free society can tolerate. I do not think it anymore intended to leave the conscience of a minority to fix its limits. Civil government cannot let any group ride rough-shod over others simply because their 'consciences' tell them to do so." *Douglas v. Jeanette*, 319 US 157, 179 (1943).

³⁰ See, e.g., "Commission On Sexual Orientation and Gender Identity Section of Individual Rights and Responsibilities: Report to the House of Delegates," American Bar, American Bar Association, https://www.americanbar.org/content/dam/aba/administrative/sexual_orientation/2015-hod-ann-mtg-doc-112.pdf, p. 3; *Pickup v. Brown*, 740 F.3d 1208 (9th Cir.), cert. denied, 134 S. Ct. 2871 (2014) and cert. denied sub nom. *Welch v. Brown*, 134 S. Ct. 2881 (2014); *King v. Christie*, 767 F.3d 216 (3d Cir. 2014).

³¹ *Ferguson v. JONAH*, No. L-5473-12, slip op. at 27 (N.J. Super. Ct. Feb. 5, 2015).

³² *Ibid.*

Court ruled that a law was unconstitutional that (1) sought to compel unlicensed pro-life pregnancy clinics to provide notice that they were unlicensed and not supervised by a licensed medical provider and (2) to require licensed pro-life pregnancy clinics to notify clients of state-sponsored free abortion services and contact information for those service locations. The Supreme Court rejected the lower court's unique treatment of "professional speech" as a category entitled to lower constitutional protection than other speech. The Court determined that a law requiring these clinics to "speak" (provide notices contrary to their wishes) was unconstitutional. The ruling affording protection to professional speech prompted legal challenges to conversion therapy bans in various states, some of which have been at least temporarily successful (see the map reproduced above for those states protected by preliminary injunctions halting the enforcement of conversion therapy bans).³³

As one example of a recent success, one federal appeals court did side with two therapists who argued that a ban on sexual orientation change efforts was an unconstitutional infringement on their right to speak freely with counselees. In *Otto v. City of Boca Raton*, 981 F.3d 854 (11th Cir. 2020), the City of Boca Raton and Palm Beach County, Florida, enacted ordinances that prohibited licensed therapists from engaging in therapy with the goal of changing a minor's sexual orientation or gender identity or expression. Notably, the ordinances did permit therapy to assist minors undergoing gender transition, just not the other way around. In arguing against this restriction on their ability to use talk therapy with counselees, the therapists contended that their clients came to them with "sincerely held religious beliefs" that conflicted with homosexual orientation or gender identity confusion. Although the government conceded that the laws restricted speech, it sought to justify their enactment due to the increased depression and suicides rates supposedly caused by this type of therapy. The Eleventh Circuit Court of Appeal analyzed the laws under the United States Constitution, held them invalid, and required the entry of a preliminary injunction preventing the enforcement of the ordinances.

³³ Mason D. Bracken, "Torture Is Not Protected Speech: Free Speech Analysis of Bans on Gay Conversion Therapy," 63 Wash. U. J. L. & POL'Y 325 (2020), https://openscholarship.wustl.edu/law_journal_law_policy/vol63/iss1/16, p. 328; Movement Advancement Project, "Equality Maps: Conversion Therapy Laws," https://www.lgbtmap.org/equality-maps/conversion_therapy.

While the ruling is to be celebrated, there are at least two comments made by the court that are worth mentioning. First, the court recognized that “[t]his decision allows speech that many find concerning—even dangerous. *** People have intense moral, religious, and spiritual views about these matters—on all sides. And that is exactly why the First Amendment does not allow communities to determine how their neighbors may be counseled about matters of sexual orientation or gender. ‘If there is a bedrock principle underlying the First Amendment, it is that the government may not prohibit the expression of an idea simply because society finds the idea itself offensive or disagreeable.’”³⁴ The second is the recognition by the court that the opposing sides to this dispute contest what is meant by the term “conversion therapy.” The issue was phrased in a way that provides a dignified solution to biblical counselors who do not want to be mixed up with secular, abusive treatments that have nothing to do with the Bible: “We are mindful that the terminology itself is contested. Plaintiffs reject the often-used label ‘conversion therapy,’ which they associate with ‘shock treatments, involuntary camps, and other chimerical or long-abandoned practices.’ We will proceed with the broad (if imperfect) term ‘sexual orientation change efforts.’ This term is used in both ordinances, and all parties seem to accept it.”³⁵

While these trends provide some basis for optimism, scholars differ in their opinions as to how the Supreme Court will ultimately rule when it is finally presented with a case that is directly on point.

WHAT TO EXPECT

Legislative Attacks Against Biblical Counselors Will Grow

Scripture warns that as history progresses, evil influence will grow and be sharper and sharper against Christian living (2 Timothy 3:1-5; 2 Peter 3:3). At this point, every major psychological association in the United States has taken a public position against conversion therapy. While some have yet to expand that definition to specifically include Christian discipleship and biblical counseling, that day is coming.³⁶ Hand-in-hand with that secular evolution, legislators will push more

³⁴ *Otto v. City of Boca Raton*, 981 F.3d 854, 871-872 (11th Cir. 2020) (citation omitted).

³⁵ *Ibid.*, 859 n1.

³⁶ See, e.g., Kori Cordero and Vanessa Carlisle, “Banning Conversion Therapy on Minors: A Guide for Creating Tribal and State Legislation,” *American Bar*, American Bar Association, Feb.

and more toward finding statutory solutions against Christian influence in the counseling room. Biblical counselors should expect that the initial attacks will not be outright bans on preaching or clergy-directed counseling. Rather, the danger will be in the quiet expansion of statutory definitions that seek to encompass what happens in the biblical counseling room.

As described above, this expansion already includes what “conversion therapy” supposedly means. But that is not even the most dangerous slippage. For example, California already includes a litany of professionals in its ban, including those that practice in the mental health arena.³⁷ Buried in the thousands of laws that California has enacted is this definition of the practice of marriage and family therapy: “[T]he application of psychotherapeutic and family systems theories, principles, and methods in the delivery of services to individuals, couples, or groups in order to assess, evaluate, and treat relational issues, emotional disorders, behavioral problems, mental illness, alcohol and substance use, and to modify intrapersonal and interpersonal behaviors.”³⁸ Currently, “ministers of the gospel” are exempted from California licensure requirements, which is one reason why this author believes that Consent to Counsel forms should specify that biblical counselors are ministers of the Gospel of Jesus Christ.³⁹ It is not difficult to see how legislators and advocates will someday try to jam biblical counselors into this overbroad state definition, thus requiring either a cessation of biblical counseling activities or voluntary submission to state licensure requirements and regulations. LGBTQ advocates already call what happens in the counseling room “medical treatment” as it relates to psychotherapy, and because the state is empowered to regulate such treatment, it should be anticipated that they will attempt to frame biblical counseling as the unlicensed practice of psychotherapy or medicine. Once that viewpoint is adopted, biblical counselors may find restrictive laws being applied to them and their counseling practices. Depending on when and where those laws are challenged, courts may defer to legislatures as to how best to govern their populace. And, as demonstrated by the political turmoil over

2019, https://www.americanbar.org/content/dam/aba/administrative/sexual_orientation/banning-conversion-therapy-legislative-guide.pdf.

³⁷ Cal. Bus. & Prof. Code § 4980 et seq.; see also Kori Cordero and Vanessa Carlisle, “Banning Conversion Therapy on Minors: A Guide for Creating Tribal and State Legislation,” *American Bar*, American Bar Association, Feb. 2019, https://www.americanbar.org/content/dam/aba/administrative/sexual_orientation/banning-conversion-therapy-legislative-guide.pdf, p. 51.

³⁸ Cal. Bus. & Prof. Code § 4980.02(a).

³⁹ Cal. Bus. & Prof. Code § 4980.01.

the past handful of years, the balance of supposedly conservative justices versus liberal justices on the United States Supreme Court can change. Only God knows how that will impact future generations of biblical counselors. But no one should expect the climate to improve.

Lawsuits Against Biblical Counselors Will Increase

On the same day that Christian baker Jack Phillips won a hard-fought battle to have his case heard by the United States Supreme Court on whether he should have been penalized for refusing to make a same-sex wedding cake, he was sued again by a separate individual for refusing to make a cake celebrating that person's gender transition.⁴⁰ The goal is to crush this Christian businessman financially.

Mr. Phillips's experience should serve as a warning to biblical counselors. Those who warn their counselees of the spiritual (and physical) dangers of homosexuality and transgenderism may one day be targets of overzealous LGBTQ advocates and their supporters, whether through government enforcement, criminal proceedings, or private lawsuits. Such counselors will be subjected to accusations of malpractice, practicing without a license, consumer fraud, abuse, and negligence.⁴¹

Indirect Attacks Will Increase

Eliminating the Lawyers

At this point in American history, defendants still are entitled to an attorney of their own choosing. But biblical counselors should consider the American Bar Association's position on LGBTQ issues and conversion therapy, which is decidedly liberal with no tolerance for dissenting views.⁴² Lawyers already are being

⁴⁰ Colleen Slevin, "Christian Baker Sued Again for Refusing to Bake a Cake," *News & Reporting, Christianity Today*, 24 Mar. 2021, <https://www.christianitytoday.com/news/2021/march/colorado-christian-baker-jack-phillips-sued-lgbt-cake-court.html>.

⁴¹ See, e.g., <https://www.collegesoflaw.edu/blog/2020/05/27/the-constitutionality-of-conversion-therapy-bans/> (discussing potential avenues for regulating unlicensed sexual orientation change efforts and legislative attempts to classify the advertisements for those services as consumer fraud).

⁴² See, e.g., "Commission On Sexual Orientation and Gender Identity Section of Individual Rights and Responsibilities: Report to the House of Delegates," *American Bar*, American Bar Association, https://www.americanbar.org/content/dam/aba/administrative/sexual_orientation/2015-hd-ann-mtg-doc-112.pdf.

required to participate in continuing education courses that seek to indoctrinate them on such issues, with the idea being to advance LGBTQ positions through attorney regulation.⁴³ They are prohibited from discriminating or harassing individuals based on sexual orientation and gender identity.⁴⁴ It is not difficult to imagine a time when attorneys are required to either affirm such positions, represent “disadvantaged” LGBTQ clients in such cases, or simply resign from the practice of law. This could be accomplished through direct prohibitions by bar associations or through the refusal of insurance companies to provide malpractice insurance coverage for such lawyers. If that occurs, biblical counselors may find themselves named as defendants in various legal proceedings without competent lawyers to represent them.

Regulating Sunday School, Christian Youth Camps, and After School Programs

LGBTQ advocates make no secret of their disdain for any Christian effort designed to point homosexuals to Christ. Any talk of judgment or becoming a “new creature” in Christ (2 Corinthians 5:17) is cause for extreme hatred and a gnashing of teeth (Acts 7:54; Psalm 35:16, 37:12, 112:10; Lamentations 2:16). They do not want to put this sinful life in the past (1 Corinthians 6:11). Instead, they claim that “LGBTQIA+ people don’t need to be cured, and interventions that seek to make a person straight or cisgender can and do cause significant long-term harm to victims. Conversion practice is abuse, and it must be banned, in every setting and for everyone subjected to it.”⁴⁵ They demand approval of the homosexual lifestyle, contrary to the warnings of the coming judgment set forth in Romans 1 and 2. And they are not content to stop at the church door. They want to ban every obstacle, whether based in Scripture or not.⁴⁶

⁴³ Kyle C. Velte, “Advancing LGBTQ+ Rights Through Attorney Regulation,” *The Regulatory Review*, The Penn Program on Regulation, 28 June 2021, <https://www.theregreview.org/2021/06/28/velte-lgbtq-rights-attorney-regulation/>.

⁴⁴ Kristine Kubes, “The Evolution of Model Rule 8.4 (g): Working to Eliminate Bias, Discrimination, and Harassment in the Practice of Law,” *American Bar*, American Bar Association, 2019, https://www.americanbar.org/groups/construction_industry/publications/under_construction/2019/spring/model-rule-8-4/.

⁴⁵ Stonewall Staff, “Netflix’s Pray Away Shows Us the Horrors of Religious Conversion Therapy – Here’s Why We Need a Ban Without Exceptions,” *Stonewall*, 2 Aug. 2021, <https://www.stonewall.org.uk/about-us/news/netflix%20%99s-pray-away-shows-us-horrors-religious-conversion-therapy-here%20%99s-why-we-need>.

⁴⁶ “Ban Conversion Therapy,” *Ban Conversion Therapy*, <https://www.banconversiontherapy.com/>.

These efforts for approval and for LGBTQ converts often are veiled with language that seeks to “protect” children. They recognize the impressionable nature of young people and do not want any form of religious discomfort brought to bear on children who may be struggling with sexual sin. To them, the religious “trauma” associated with Christian youth camps is troubling and sufficient reason to cause parents to second-guess decisions to send their youth to such activities. The same arguments would apply to Sunday school curriculum or faith-based after school programs. So while LGBTQ proponents find it easy to direct vitriol toward Christian organizations that specifically are focused on conversion therapy, their not-too-distant goal is to eliminate all such influence.⁴⁷

HOW TO PREPARE

Pray

James 5:16 indicates that the prayer of a righteous man has great power. In 2 Corinthians 5:21, Christians are called “the righteousness of God.” Therefore, the Christian prayer must be powerful and effective. Accordingly, biblical counselors should pray for at least the following: (1) For the welfare of this country (Jeremiah 29:7, “But seek the *welfare* of the *city* where I have sent you into exile, and *pray* to the Lord on its behalf, for in its *welfare* you will find your *welfare*”)⁴⁸; (2) that God would blind His opponents so that biblical counselors do not become targets; (3) that unbiblical legislation will not pass; (4) that those legislative attacks that do pass are stymied and struck down by the courts if they are enacted; (5) that biblical counselors are as prepared as they can be in anticipation of legal opposition; (6) that God would prepare competent Christian lawyers to assist when/where needed; (7) that God would lean courts in favor of biblical counselors if cases are ever filed; (8) that biblical counselors would be beyond reproach in their personal

⁴⁷ David Oliver, “‘Pray Away’ Details Trauma of LGBTQ Conversion Therapy – and New Leaders Are Still Emerging,” USA Today, Gannett Satellite Information Network, 4 Aug. 2021, <https://www.usatoday.com/story/entertainment/movies/2021/08/04/pray-away-netflix-lgbtq-conversion-therapy-documentary/5393364001/>; Casey Clark, “What Happens at Bible Camp? from ‘Cry Night’ to Shaping ‘Godly Women,’ Young Adults Who Went as Kids Say Parts of the Experience Make Them ‘Wanna Gag’ Today,” Yahoo!, 2022, <https://www.yahoo.com/lifestyle/what-happens-at-bible-camp-and-should-you-send-your-child-161000993.html>.

⁴⁸ “America is great because America is good, and if America ever ceases to be good, America will cease to be great.” William J. Federer, *America’s God and Country*, FAME Publishing, Inc, 1994, p. 205 (quoting Alexis de Tocqueville).

and professional lives; (9) that the biblical counseling ministry will increase and be fruitful in kingdom work; and (10) that those who are persecuted in this and in other countries will stand firm until the end, knowing that God wins. Above all, pray that God is glorified to the utmost, whether these worldly attacks result in pain, loss, and limitations on biblical counselors, or whether the world's attacks are stopped. God's purpose will not be thwarted (Job 42:2).

Anticipate Hatred

Biblical counselors should first expect that the world will hate them (2 Timothy 3:12, “all who desire to live a godly life in Christ Jesus will be persecuted”). As Jesus said, “If the world hates you, know that it has hated me before it hated you” (John 15:18). Why does the world hate Jesus? He answered that question in a way that relates specifically to biblical counseling. Jesus said the world “hates me because I testify about it that its works are evil” (John 7:7). This is precisely what biblical counselors are called to do. Proclaim truth. Identify sin for what it is. Encourage humble confession and repentance. Call evil exactly that—evil.

Provide Hope and Do Not Back Down

Laws that purport to restrict Christian practice, discipleship, and preaching cannot be obeyed by faithful Christians. The stakes are too high. There is a heaven and a hell. Those who call on the name of the Lord Jesus will be saved (Romans 10:13). Those who refuse will be cast into hell (Jude 1:7). Regardless of any law that tries to restrict Christian practice and discipleship, biblical counselors must proclaim truth, “warning everyone and teaching everyone with all wisdom, that we may present everyone mature in Christ” (Colossians 1:28). The Apostle Paul also states:

Or do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived: neither the sexually immoral, nor idolaters, nor adulterers, nor men who practice homosexuality, nor thieves, nor the greedy, nor drunkards, nor revilers, nor swindlers will inherit the kingdom of God. And such were some of you. But you were washed, you were sanctified, you were justified in the name of the Lord Jesus Christ and by the Spirit of our God. (1 Corinthians 6:9-10)

There is great hope in biblical truth that directs the soul to Jesus as the only avenue for lasting change. “Whoever brings back a sinner from his wandering will save his soul from death and will cover a multitude of sins” (James 5:19-20). This is God’s call to the biblical counselor. As John MacArthur has said, “Governments can make laws all they want, but they will never dictate to the church what its mission is. The church has a solemn duty to preach the Gospel of Jesus Christ so that sinners might be converted. It is a mission of mercy.”⁴⁹ Do not back down.

Take Practical Steps

There are a number of ways biblical counselors can prepare for coming legal attacks. Specifically, biblical counselors should be engaged and aware of proposed legislation that may seek to infringe on the right to provide such counsel. They should be informed. When discussions arise that tend to blur the distinctions between godly counsel and worldly therapies (such as the attempt to redefine conversion therapy in such a way as to include biblical counseling), biblical counselors should be ready to articulate opposition to such language. When legislation is proposed or passed, those same counselors should pass along the information to the local church and to biblical counseling organizations, such as ACBC. During the course of those conversations, it may be decided that the threat of legal action may need to be transmitted to legislators with the understanding (at least in the United States) that the Constitution would seem to prevent restrictions on biblical counseling. Elected politicians typically do not like to lose lawsuits that require them to pay the prevailing party’s attorneys’ fees with tax dollars.

In addition, counselors should have their documents in order. Many lawyers and judges will advise that cases are often won or lost based on the documents. For a biblical counselor, this means that Consent to Counsel forms should be well-crafted in such a way as to clearly indicate that the counsel is part of the practice of sincerely held religious beliefs, that it is provided under the patronage and/or supervision of a local church (if it is), and that it is *not* secular psychotherapy or medical treatment.⁵⁰

⁴⁹ John MacArthur, “John MacArthur: ‘And Sinners Will Be Converted,’” *Decision Magazine*, Billy Graham Evangelistic Association, 1 Mar. 2022, <https://decisionmagazine.com/john-macarthur-and-sinners-will-be-converted/>.

⁵⁰ A comprehensive discussion on Consent to Counsel forms has been provided by this author in other formats. See Todd M. Sorrell, “How to Avoid a Lawsuit,” *Legal Issues in*

There are other practical steps that biblical counselors can take to prepare for potential attacks. These include such things as obtaining insurance (or asking the local church if biblical counseling services are included in the church insurance), being careful in how website language is crafted so as to not run afoul of advertising rules, potentially not charging for biblical counseling or receiving public funds for biblical counseling services, and getting to know a local attorney who may be available in the future if the need arises.⁵¹ In addition, since the LGBTQ lobby has been drafting studies and surveys with an eye toward convincing courts that conversion therapy is ineffective and harmful, it may prove helpful for biblical counselors to garner information on those lives that have been changed by real biblical counseling, including testimonies of individuals who have passed over from a sexually deviant lifestyle or attitude to a fulfilled life in Jesus Christ.

The Ultimate Preparation

Biblical counselors should be prepared to lose—at first. In fact, Christians should be willing to lose everything—except salvation (Romans 8:35; Matthew 5:10). Nothing will stop Jesus from building His church (Matthew 16:18). Nothing will stop the conversion of the elect (John 6:37). And nothing will stop the wrath of God from being poured out on those who stand against Him and the saints (Psalm 2:1-3; Revelation 20:11-15). As to the current suffering of the saints:

Truly, I say to you, there is no one who has left house or brothers or sisters or mother or father or children or lands, for my sake and for the gospel, who will not receive a hundredfold now in this time, houses and brothers and sisters and mothers and children and lands, with persecutions, and in the age to come eternal life. (Mark 10:29-30)

CONCLUSION

Biblical counselors have in their hands the pages of Scripture that contain

Biblical Counseling: Direction and Help for Churches and Counselors, edited by Dale T. Johnson and Edward Wilde, New Growth Press, 2022, chapter 5.

⁵¹ Likewise, biblical counselors should know that there are legal organizations committed to protecting religious freedom, freedom of speech, and other Christian freedoms enjoyed in the United States. See, e.g., Alliance Defending Freedom.

the gospel message for all who believe. It is divine power through which God effectuates change in a sinner's life. This is real conversion. No government will ever make a law that will stop the true church from proclaiming that truth. "Duty is ours; results are God's."⁵²

⁵² Jerod Jordan, "Duty Is Ours; Results Are God's," *Kingsbury Journal*, Kingsbury Journal, 9 Feb. 2022, <https://www.kingsburyjournal.com/stories/duty-is-ours-results-are-gods,5558#:~:text=The%20answer%20is%20found%20in,ours%3B%20results%20are%20God's.%E2%80%9D&text=John%20Quincy%20Adams%20died%20while,for%20the%20abolition%20of%20slavery>.