

## ***“James vs. Paul: An Introduction”– James 2:14-26***

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*[What follows is the transcript of a sermon. It was originally intended to be heard, not read, so the tone is more conversational than academic. It has only been loosely edited, so forgive any grammatical, syntactical, or spelling errors. If you have questions please contact Southern Oaks Baptist Church through their official website, [www.welovethegospel.com](http://www.welovethegospel.com).]*

Take a Bible and meet me in James 2...

This sermon is going to be a little different. I told you when we started this series that there would be a couple points where we would slow down. We are entering into one of those sections. Today we will begin a little series within our series because we have come to, arguably, the most controversial section of the book. More ink has been spilled trying to sort out this section than any other section in the book. That fact alone is not the reason we will linger here a bit. Instead, I think it would be helpful for us to do so because this section affords us the opportunity to dive deeper into one of the core doctrines of the Gospel—the doctrine of justification.

Here is how the Baptist Faith and Message (2000) describes justification:

“Justification is God’s gracious and full acquittal upon principles of His righteousness of all sinners who repent and believe in Christ. Justification brings the believer unto a relationship of peace and favor with God.”<sup>1</sup>

That’s a fair definition. It’s a legal term used to describe our standing before God. When I was a new believer, I remember someone say that justification is the act of being declared “not guilty” before the courts of heaven. It’s being counted as right or “just-as-if-I-never-sinned.”<sup>2</sup> And the Gospel makes it clear that no one is justified by their own efforts. We are declared innocent or just in God’s sight on the basis of Christ’s work and Christ’s work alone. When He died in our place, He took the punishment for the sins of those who would have faith in Him to save them from sin and death. When a person believes, they are fully forgiven through Christ’s atoning blood and they are credited with Christ’s perfect record of righteousness. Forgiven and made righteous. And these supplied by Christ Himself. If you are a Christian, you are and will forever be justified.

This doctrine of justification was at the heart of the Protestant Reformation, which is why denominations like ours exist and we are not Roman Catholic. Martin Luther, the father of that Reformation, called the doctrine of justification “the first and chief article” of the Christian faith. John Calvin, another reformer, stated that justification “is the ground on which religion must be supported” and warned that “unless you understand first of all what your position is before God, and...the judgement which he passes upon you, you have no foundation on which your salvation can be laid, or on which piety toward God can be reared.” And Johann Heinrich Alsted famously expressed the sentiment that justification is “the doctrine on which the church stands or falls,” a sentiment that all the Protestant Reformers would have wholeheartedly embraced.<sup>3</sup>

And if I could draw from brother Luther once more (and not for the last time in this series), listen to how, in his 1535 *Lectures on Galatians*, he expressed the stakes that are caught up in the integrity of this doctrine:

“But it is because, as I often warn you, there is a clear and present danger that the devil may take away from us the pure doctrine of works and of human traditions. It is very necessary, therefore, that this doctrine of faith be continually read and heard in public. No matter how well known it may be or how carefully learned, the devil, our adversary, who prowls around and seeks to devour us (1 Peter 5:8), is not dead. Our flesh also goes on living. Besides, temptations of every sort attack and oppress us on every side. Therefore this doctrine can never be discussed and taught enough. If it is lost and perishes, the whole knowledge of truth, life, and salvation is lost and perishes at the same time. But if it

flourishes, everything good flourishes—religion, true worship, the glory of God, and the right knowledge of all things and of all social conditions.”<sup>4</sup>

In other words, it’s kind of a big deal.

And my hope is that this little series will show why that is, though I know we could never do the glorious riches of this doctrine justice. Therefore, our aim will be more modest. What we are going to do over the next few weeks is consider the alleged tension that exists between what James says on the subject and what Paul says on the subject. Certain sermons will find us diving deep into Paul’s words on the matter and other sermons will wrestle with what James contributes to our understanding. Along the way we will try to see if any true tension really exists or if there is a way to harmonize the two. And by series end I hope to show some of the wonderful implications of the doctrine of justification in our lives today.

Today will set the stage. It’s going to be a little different than usual because we are not going to unpack one particular text but show the contrast in several. Ordinarily when I preach, the sermon is an exposition of the text (as it should be), but, in the background, I’m also aiming to subtly teach you how to handle the Word of God correctly. So if things go as planned, you’re not just learning the meaning of the text, but you’re also being equipped to study and interpret the Word of God on your own. You may not even realize that is happening. But I hope, by God’s grace, that it is. This morning, I want to bring some insights on methodology more to the surface and explain how we can navigate this so-called tension between James and Paul.

Let’s begin then with a word on methodology...

When I teach a class on interpreting the Bible, we eventually come to sessions that deal with special considerations for different genres (i.e., kinds of literature) we find in the Bible. If you are familiar with the contents of the Bible, you will know that there are different literary types employed from book to book and sometimes within the course of the same book. Narrative reads differently than poetry. The Gospel of Mark reads differently than the prophet Jeremiah. The Old Testament wisdom literature is markedly different than the apocalyptic material we find in Revelation. You get the idea.

The Bible is a compilation of several different documents. Within that diversity of forms and styles, there is a unity of message and revelation. There are many writings, but one witness. The diversity is a product of the diverse authors that God used to communicate His Word across diverse times and cultures. The unity is a product of the unchanging God who inspired each of those authors to write the very words He intended them to write as He revealed His person and purposes to humanity.

When we interpret literature, there are going to be certain principles that we apply across the board, regardless of source. But there are also special considerations that we give to different kinds of literature. You don’t read the phone book, the same way you read a will left by a deceased relative. You don’t read a love letter in the same way that you read the fine print on your latest smartphone update. So by instinct, you recognize that different texts require different things from you as a reader.

That’s similar to the Bible. Each genre requires something different of us. Among other things, it requires us to take into account different features of its genre. For our purposes in this series, we are dealing with the epistolary genre. The writings of Paul in the New Testament are epistles/letters and so is this writing of James. The more we understand about first-century Greco-Roman letters, the better we will be at interpreting their letters because that is what they are.

This is not the venue for us to unpack all these features of first-century letters, but there is one observation that is worth pausing to remember. If you were taking a seminary class on biblical hermeneutics (i.e., the science of interpretation), when you get to the discussion on New Testament letters (or any letters for that matter), your

professor, hopefully, is going to point out that letters are “situational” or “occasional.” What does that mean? “This means”, according to one popular textbook,

“...that they were written to address specific situations or problems related to the author or (usually) the readers. Those who wrote New Testament letters did so to meet the practical needs of those receiving the letters. They wrote to clarify an issue (e.g., Thessalonians), to address a doctrinal problem (e.g., Colossians), or to confront the readers about their behavior (e.g., James). The topics covered in a letter were usually dictated by the specific situations at work within the community to which the apostle wrote.”<sup>5</sup>

If you think about that, it makes sense, doesn't it? Back then, if you couldn't communicate in person, there was no easy way to do it. There were no phones you could call someone on and just shoot the breeze. There were no text messages and social media DMs. You either traveled to the person or you sent them a letter. The letter was the easier option, but it was by no means easy. You would have to acquire the materials for the letter (paper and ink), possibly hire someone to write it (depending on your education), and then find someone you trusted to deliver it to the recipient. And financing all of that could be challenging.

Clearly, writing and sending a letter was not nearly as simple back then as it is today. So if you were going to undertake the effort, you probably were going to wait until you had something to say. You generally would wait until some situation emerged that you wanted to speak into but were unable to address in person. And that's why we say that letters are “situational” or “occasional.” They have an objective, they're purposeful, they're contextual, they're tailored to the specific needs or challenges of the person or community that is being addressed.

Why does that matter? Here's why, according to Scott Duvall and Danny Hays:

“These letters were never meant to be exhaustive dictionaries of Christian doctrine. Rather than writing systematic theologies, the authors used their letters to apply theology in practical ways to specific situations in the church....As a result, when interpreting New Testament letters we must be careful not to conclude too much from only one letter. Paul's letter to the Galatians emphasizes freedom in Christ for a church struggling with legalism. In 1 Corinthians, however, he stresses obedience for a church that is taking its freedom to immoral extremes. Neither letter, by itself, represents Paul's entire teaching on freedom or obedience. Both letters offer a corrective message tailored to the circumstances of those specific churches. We know from all of Paul's letters that he endorses both freedom and obedience, but he emphasizes freedom in Galatians and obedience in 1 Corinthians in order to correct the course of each church headed in the wrong direction. If we fail to see the letters as occasional or situational, we will be tempted to conclude too much from one letter. This can easily lead us to misinterpret the letters.”<sup>6</sup>

This is such an important insight. There is so much mishandling of God's Word that occurs because people have not understood this observation related to the genre of letters. We can assume that what a New Testament writer puts into a letter is what he thought was most pertinent to address the need of his readers, but we cannot assume that what he includes in a letter is all that there is to say on the matter. This is why we do well to allow the Scriptures to help us interpret other Scriptures. We read biblical texts in light of other biblical texts. We consider how one sheds light on another. This is the only way to form and maintain a balanced biblical perspective.

This will serve as one of the foundational presuppositions for this little series. We want to consider how Paul's comments on justification shed light on James' and how James' comments help us better understand Paul. If we understand one to the exclusion of the other, then we will not have arrived at the biblical understanding of justification and we will, at best, fail to appreciate the glory of our salvation in Christ or, at worst, fail to

experience that salvation entirely. So the task before us is significant. But the journey will not be without its challenges.

And now we've come to that part of the sermon where I show you why. You have your Bible open to James 2? This is probably the longest it has taken me to get to a text ever. But look down where we left off in verses 14 and following...This is God's Word.

*“What good is it, my brothers, if someone says he has faith but does not have works? Can that faith save him? <sup>15</sup> If a brother or sister is poorly clothed and lacking in daily food, <sup>16</sup> and one of you says to them, ‘Go in peace, be warmed and filled,’ without giving them the things needed for the body, what good is that? <sup>17</sup> So also faith by itself, if it does not have works, is dead.*

*<sup>18</sup> But someone will say, ‘You have faith and I have works.’ Show me your faith apart from your works, and I will show you my faith by my works. <sup>19</sup> You believe that God is one; you do well. Even the demons believe—and shudder! <sup>20</sup> Do you want to be shown, you foolish person, that faith apart from works is useless? <sup>21</sup> Was not Abraham our father justified by works when he offered up his son Isaac on the altar? <sup>22</sup> You see that faith was active along with his works, and faith was completed by his works; <sup>23</sup> and the Scripture was fulfilled that says, ‘Abraham believed God, and it was counted to him as righteousness’—and he was called a friend of God. <sup>24</sup> You see that a person is justified by works and not by faith alone. <sup>25</sup> And in the same way was not also Rahab the prostitute justified by works when she received the messengers and sent them out by another way? <sup>26</sup> For as the body apart from the spirit is dead, so also faith apart from works is dead.” (James 2:14-26)*

Now, keep your finger there if you want, and flip over to the left in your Bible to the third chapter of Romans...This was one of Paul's letters. Jump down to verse 21 and following. This is *also* God's Word...

*“But now the righteousness of God has been manifested apart from the law, although the Law and the Prophets bear witness to it— <sup>22</sup> the righteousness of God through faith in Jesus Christ for all who believe. For there is no distinction: <sup>23</sup> for all have sinned and fall short of the glory of God, <sup>24</sup> and are justified by his grace as a gift, through the redemption that is in Christ Jesus, <sup>25</sup> whom God put forward as a propitiation by his blood, to be received by faith. This was to show God's righteousness, because in his divine forbearance he had passed over former sins. <sup>26</sup> It was to show his righteousness at the present time, so that he might be just and the justifier of the one who has faith in Jesus. <sup>27</sup> Then what becomes of our boasting? It is excluded. By what kind of law? By a law of works? No, but by the law of faith. <sup>28</sup> For we hold that one is justified by faith apart from works of the law.” (Romans 3:21-28)*

Then look at what he says at the beginning of chapter 4...

*“What then shall we say was gained by Abraham, our forefather according to the flesh? <sup>2</sup> For if Abraham was justified by works, he has something to boast about, but not before God. <sup>3</sup> For what does the Scripture say? ‘Abraham believed God, and it was counted to him as righteousness.’ <sup>4</sup> Now to the one who works, his wages are not counted as a gift but as his due. <sup>5</sup> And to the one who does not work but believes in him who justifies the ungodly, his faith is counted as righteousness...” (Romans 4:1-5)*

And, just for good measure, let's look at what Paul says in his letter to the Galatians. Flip to the right a little bit and find Galatians, chapter 2...Start at verse 15...

*“We ourselves are Jews by birth and not Gentile sinners; <sup>16</sup> yet we know that a person is not justified by works of the law but through faith in Jesus Christ, so we also have believed in Christ Jesus, in order to be justified by faith in Christ and not by works of the law, because by works of the law no one will be justified.” (Galatians 2:15-16)*

Look also at the beginning of chapter 3...

*“O foolish Galatians! Who has bewitched you? It was before your eyes that Jesus Christ was publicly portrayed as crucified. <sup>2</sup> Let me ask you only this: Did you receive the Spirit by works of the law or by hearing with faith? <sup>3</sup> Are you so foolish? Having begun by the Spirit, are you now being perfected by the flesh? <sup>4</sup> Did you suffer so many things in vain—if indeed it was in vain? <sup>5</sup> Does he who supplies the Spirit to you and works miracles among you do so by works of the law, or by hearing with faith— <sup>6</sup> just as Abraham ‘believed God, and it was counted to him as righteousness’?*

*<sup>7</sup> Know then that it is those of faith who are the sons of Abraham. <sup>8</sup> And the Scripture, foreseeing that God would justify the Gentiles by faith, preached the gospel beforehand to Abraham, saying, ‘In you shall all the nations be blessed.’ <sup>9</sup> So then, those who are of faith are blessed along with Abraham, the man of faith.*

*<sup>10</sup> For all who rely on works of the law are under a curse; for it is written, ‘Cursed be everyone who does not abide by all things written in the Book of the Law, and do them.’ <sup>11</sup> Now it is evident that no one is justified before God by the law, for ‘The righteous shall live by faith.’ <sup>12</sup> But the law is not of faith, rather ‘The one who does them shall live by them.’ <sup>13</sup> Christ redeemed us from the curse of the law by becoming a curse for us—for it is written, ‘Cursed is everyone who is hanged on a tree’— <sup>14</sup> so that in Christ Jesus the blessing of Abraham might come to the Gentiles, so that we might receive the promised Spirit through faith.” (Galatians 3:1-14)*

And now the stage is set. What are we to make of all of this? It certainly could seem, at first glance, that James and Paul don’t agree on justification. James says, “*You see that a person is justified by works and not by faith alone*” (James 2:24) and then builds a biblical case to make his point. Paul says things like, “*we hold that one is justified by faith apart from works of the law*” (Rom. 3:28) and “*by works of the law no one will be justified*” (Gal. 2:16), and then proceeds to build his biblical case, using some of the same Old Testament texts that James used. What are we to make of the seeming disconnect?

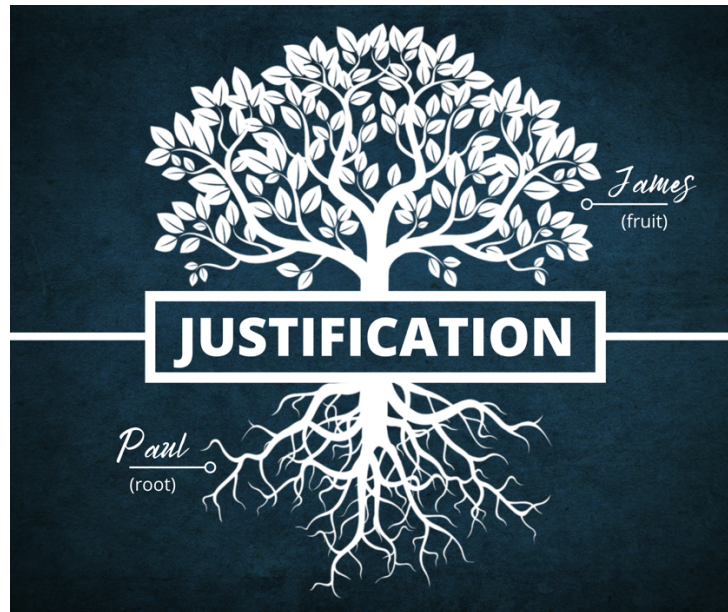
Multiple suggestions have been put forth over the years. Let me list a few of them.<sup>7</sup>

1. The apostles Paul and James substantially disagreed about the means of justification.
2. Paul has misunderstood James’ teaching.
3. James has misunderstood Paul’s teaching.
4. Each man was addressing different aspects of justification related to different misunderstandings of the doctrine.
5. Some combination of the above.

You probably know where I am going to land. I don’t think option 1 is the best explanation because the interaction of James and Paul in the New Testament would suggest harmony in their understanding of the Gospel, not conflict. They were co-laborers in the effort. Options 2 and 3, don’t work for the same reason, though it is possible that they each are reacting to the misunderstandings of others to their opposites view. I will argue in this series that option 4 seems to best account for the evidence.

Remember, all of these verses are drawn from letters. Each author is addressing the situation of their intended readers. It seems to me that Paul and James are addressing different potential misunderstandings of justification in the communities they are addressing. Those verses from Paul seem to be concerned with the root of our justification, the inception, the inevitable and accompanying result. We are justified apart from anything we do. We are saved through faith alone.

James, on the other hand, is addressing a different aspect of our salvation. He is dealing more with the fruit of our justification. He recognized that true justification is always accompanied by a changed life. So while we may be saved through faith alone, the faith that saves is never alone. That’s James’ point in a nutshell. So you might say that Paul is helping us to see the root of our salvation and James is helping us to see the fruit of our salvation. That is what I was trying to communicate in the sermon series image.



But please don't misunderstand, Paul also addresses the fruit of justification in his writings, just as James likewise addresses the root. Indeed, I think we will discover that there is convincing evidence that they agree on these matters. But their stress is different in their writings because the pressing concerns that they were trying to address with their audiences were different. The controversial sections that are often compared bring out these different aspects, but they are complementary aspects, not contradictory ones. That's what I will try to show in this series. We will not have a proper understanding of justification, unless we take into account both author's contribution to the matter. And just like in their day, different situations today will call for each corrective.

Let me give you a quick example that I encountered recently in a book by Joel Beeke and Steven Lawson.<sup>8</sup> Imagine over lunch you have a meal with a new neighbor and the subject of faith comes up. Let's call him "Mr. Jones." He says that he is also a Christian. You ask him, "On what basis do you believe that you are a Christian?" And he answers,

"Well, I think my entire life shows that I am a solid Christian. I have grown up in church and have always been religious. I believe the Bible is the inerrant Word of God and have soundly...biblical beliefs. I read the Bible and pray every day and never miss a church service. I give my money to the church, and I am very generous to Christian organizations and charities. I attend as many...conferences as I can. I am a faithful husband, a good father, and a loyal worker. On these grounds, I believe I am a Christian..."<sup>9</sup>

So that's Mr. Jones. Your conversation wraps up and you immediately have a meeting with a new coworker, Mr. Smith, at the local coffee shop. Somehow the same topic comes up and you ask him the same question: "On what basis do you believe that you are a Christian?" He replies,

"My answer is simple: I've been born again. I have been justified, I'm saved, and I trust in the blood of Christ alone for my salvation. All praise be to the sovereign grace of God. Hallelujah!"<sup>10</sup>

Later that night, you are reflecting on these conversations and their answers. You ask yourself, which one gave evidence of genuine salvation? Can you say with confidence that either Mr. Jones or Mr. Smith is a Christian? The answer is: not really.

You see, Mr. Jones gave you a wonderful list of good works and activities, the kinds of things you would expect Christians to prioritize and participate in, but gave no evidence that he believes that his salvation rests on Christ

alone and *Christ's* work alone. For all you know, he could be banking on all that “churchy” and “spiritual” activity to get him into heaven one day. Mr. Jones needs to read some Paul, maybe Romans, Galatians, Ephesians, or Philippians, so that he can learn that the righteousness he needs is not his own. It's Christ's!

Meanwhile, Mr. Smith said a lot of the right things, but what if I told you that his former pastor would have described him as one who talks like an angel, but has a history of abusing his family and laundry list of trouble that follows him and runs counter to the mask he wears on Sunday? He's all talk and no walk. If Mr. Jones was a legalist, then Mr. Smith is an antinomian. He needs a book like James to correct him. Indeed, James' words on justification were written precisely for his variety of hypocrisy.

Do you see? We need both James and Paul. But some situations require us to lead with Paul and get to the root of justification, while other situations call for a heavy dose of James and some tough talk about the fruit of justification. But we need both. We need to understand the context of both. And we are going to consider both in great detail in the weeks ahead, Lord willing. But we will have to stop there for today. To be continued...

Take your Lord's Supper unit that you received when you came in and go ahead and open it and get ready to partake. While you are doing so, let me remind you that this ordinance is for believers, those whose faith rests in Jesus to save them and have been born again. If you are here and that's not you or you have questions about that, let me advise you to refrain from participating in this and instead grab one of those black books, *What Is the Gospel?*, that are at the exits when you are dismissed today. I'm quite confident that you will find those very helpful and I would love to talk with you more after the service or later in the week.

But for my brothers and sisters in this place, those who have experienced salvation, as we come to the table this morning, sharing the Lord's Supper, we should be reminded that justification has an indispensable place in our glorious salvation that Christ has accomplished on our behalf. But our justification before God, received by faith alone in Christ alone for the glory of God alone, is also inextricably linked to other beautiful facets of our salvation. One place this can be seen succinctly is toward the end of Romans 8, in a section sometimes referred to as “the golden chain of salvation.” It reads,

*“And we know that for those who love God all things work together for good, for those who are called according to his purpose. <sup>29</sup> For those whom he foreknew he also predestined to be conformed to the image of his Son, in order that he might be the firstborn among many brothers. <sup>30</sup> And those whom he predestined he also called, and those whom he called he also justified, and those whom he justified he also glorified.”* (Romans 8:28-30)

These are some beautiful words. Some comforting words. They don't tell us everything that God has done in saving us (e.g., there is no mention of our sanctification), but they do communicate that our salvation, from beginning to end, is owing to God. He and He alone saves us. And He does so on the basis of Christ's work and not our own. Christ's death is counted as our judgment and His perfect record of righteousness is gifted to us freely through faith, when we trust in Christ alone to save us. And, as the Bible says elsewhere, “*he who began a good work in you will bring it to completion at the day of Jesus Christ*” (Phil. 1:6). God always finishes what He starts.

Therefore, if you find yourself trusting in Christ as your only hope in life and death, then you stand justified—declared innocent—before God today. Fully forgiven. Totally cleansed. In right standing with God, now and forever, because Jesus lived a perfect life in your place, died the death that you deserved, and rose from the dead victorious over your sin and death. And if that's true of you—if you're trusting in Christ today—then every link in that chain is part of your story.

How awesome is that!

And while that experience was freely given to you as an act of grace, it was accomplished solely by Christ at a great price. The sacrifice He offered on the cross. And that is what this ordinance is meant to remind us of. The bread in your hand calls to mind the body of Christ, broken for us in death. The cup of wine, the blood that He shed to atone for our sin. “*Greater love has no one than this, that he lay down his life for his friends*” (John 15:13). Jesus said that. And then He did that.

So I invite you who have faith in Christ to take, eat, and remember...

Let's pray...

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<sup>1</sup> See Article IV.B: <https://bfm.sbc.net/bfm2000/#iv-salvation>.

<sup>2</sup> We had three services this Sunday and I confirmed that in one of them I misspoke and said that this friend described justification as “being *made* ‘just-as-if-I-never-sinned,’” but “made” is not the best word choice. That could be misleading. One of the points I will make later in the series has to do with the difference between the connotation of the word “made” and “declared” just. As Erik Raymond explains, “Justification is the instantaneous and irreversible divine declaration of the unrighteous as positionally righteous, based upon the merits of Christ’s obedience, applied by grace and received through faith (Rom. 3.24-28; 4.1-5; 5.1-2). God declares the unjust to be just based upon Christ’s work for them.” Similarly, Thomas Schreiner explains that this term, justification, “is forensic, so that it means ‘declare righteous’ rather than ‘make righteous.’ In the history of interpretation Augustine argued that the term meant ‘make righteous,’ and this reading ultimately was defended by Roman Catholicism. The Reformers understood the term to be forensic and therefore argued that a declaration of righteousness was intended...The forensic character of the verb *justify* is evident in Romans 8:33: ‘Who shall bring any charge against God’s elect? It is God who justifies.’ The legal setting of the text is clear, for the issue is whether anyone will bring a charge of condemnation against believers on the Day of Judgment. God is represented as a judge, and charges are brought against believers. But God dismisses the charges, for he already has declared that believers are justified before him. Clearly, ‘justifies’ here means that God has declared believers to be in the right.” Thomas R. Schreiner, *40 Questions about Christians and Biblical Law* (Grand Rapids: Kregel Academic, 2010), 117. See also <https://www.thegospelcoalition.org/blogs/erik-raymond/the-just-as-if-id-definition-of-justification/>.

<sup>3</sup> Matthew Barrett, “The Foolishness of Justification” in *The Doctrine on Which the Church Stands or Falls: Justification in Biblical, Theological, Historical, and Pastoral Perspective*, ed. Matthew Barrett (Wheaton: Crossway, 2019), 35.

<sup>4</sup> Martin Luther, *Lectures on Galatians* (1535), *LW* 26:3.

<sup>5</sup> J. Scott Duvall and J. Daniel Hays, *Grasping God’s Word: A Hands-On Approach to Reading, Interpreting, and Applying the Bible* (3 Ed.; Grand Rapids: Zondervan, 2012), 253-254.

<sup>6</sup> *Ibid.*, 254.

<sup>7</sup> Karen H. Jobes summarizes these options in a section in *Letters to the Church: A Survey of Hebrews and the General Epistles* (Grand Rapids: Zondervan, 2011), 216-221. She was kind enough to credit me in a footnote for the organization of these options, but I’m quite sure her articulation of them was far better than my own.

<sup>8</sup> This is an example I have drawn from Joel R. Beeke and Steven J. Lawson, *Root & Fruit: Harmonizing Paul and James on Justification* (Conway, AR: Free Grace Press, 2020), 12-15; 65-70.

<sup>9</sup> *Ibid.*, 12.

<sup>10</sup> *Ibid.*, 13.