

Journal of Catholic Legal Studies

Volume 47
Number 2 *Volume 47, 2008, Number 2*

Article 3

Introduction

Michael A. Simons

Follow this and additional works at: <https://scholarship.law.stjohns.edu/jcls>



Part of the [Catholic Studies Commons](#)

This Symposium is brought to you for free and open access by the Journals at St. John's Law Scholarship Repository. It has been accepted for inclusion in Journal of Catholic Legal Studies by an authorized editor of St. John's Law Scholarship Repository. For more information, please contact selbyc@stjohns.edu.

SYMPOSIUM

**CATHOLIC TEACHING, CATHOLIC VALUES,
AND CATHOLIC VOTERS: REFLECTIONS
ON FORMING CONSCIENCES FOR
FAITHFUL CITIZENSHIP**

INTRODUCTION

MICHAEL A. SIMONS[†]

America is . . . a land of great faith. Your people are remarkable for their religious fervor and they take pride in belonging to a worshipping community. They have confidence in God, and they do not hesitate to bring moral arguments rooted in biblical faith into their public discourse.

*—Pope Benedict XVI, addressing the United States Bishops in Washington, D.C., April 16, 2008.*¹

Before, during, and after his visit to the United States in April 2008, Pope Benedict XVI expressed his admiration for the active role that religion and faith play in American public life.² As one commentator noted, Benedict “entertains a recurring vision” of America as “an optimistic and diverse but essentially pious society in which faiths and a faith-based conversation on

[†] Professor of Law, St. John’s University School of Law; Fellow, Vincentian Center for Church and Society.

¹ BENEDICT XVI, ADDRESS *CELEBRATION OF VESPERS AND MEETING WITH THE BISHOPS OF THE UNITED STATES OF AMERICA* (April 16, 2008).

² After returning to Rome, Pope Benedict noted that his visit had enabled him

to pay tribute to this great Country which was built from the outset on the foundations of a felicitous combination of religious, ethical and political principles which still constitute a valid example of healthy secularism where the religious dimension, with the diversity of its expressions, is not only tolerated but appreciated as the Nation’s “soul” and a fundamental guarantee of human rights and duties.

BENEDICT XVI, GENERAL AUDIENCE *APOSTOLIC JOURNEY TO THE UNITED STATES OF AMERICA* (2008).

social issues are kept vital by the Founding Fathers' decision to separate church and state."³ This Symposium considers the Catholic hierarchy's most recent contribution to that "faith-based conversation on social issues": *Forming Consciences for Faithful Citizenship: A Call to Political Responsibility from the United States Catholic Bishops*.⁴

Every four years, as the nation begins a presidential election cycle, the United States Conference of Catholic Bishops issues a statement focused on "political responsibility" and "faithful citizenship."⁵ In this election cycle, the bishops' statement arrived on the eve of presidential primary season in which religion and faith would play a particularly visible role. One of the main Republican contenders, former Arkansas governor Mike Huckabee, was an ordained minister.⁶ Another prominent Republican candidate, former Massachusetts Governor Mitt Romney, felt compelled to give a highly-publicized speech explaining and defending his Mormon faith.⁷ Barack Obama, the eventual Democratic nominee, gave a similarly-publicized speech seeking to distance himself from controversial remarks made by his former pastor.⁸ And John McCain, the eventual Republican nominee, had to distance himself from an endorsement by a prominent televangelist who had previously expressed anti-Catholic sentiments.⁹ All this, in an election in which the

³ David van Biema & Jeff Israely, *The American Pope*, TIME, Apr. 14, 2008, at 46.

⁴ *Id.*; UNITED STATES CONFERENCE OF CATHOLIC BISHOPS, *Forming Consciences for Faithful Citizenship: A Call to Political Responsibility from the Catholic Bishops of the United States* (2007) [hereinafter *Forming Consciences*], available at <http://www.usccb.org/faithfulcitizenship/FCStatement.pdf>.

⁵ See *Forming Consciences*, *supra* note 4, ¶ 3.

⁶ See Gail Russell Chaddock, *Mike Huckabee: A Conservative with a Social Gospel*, CHRISTIAN SCI. MONITOR, Nov. 7, 2007, at 1.

⁷ See Jan Shipps, *What Made Romney's Big Speech So Mormon*, CHRISTIAN SCI. MONITOR, Dec. 11, 2007, at 9.

⁸ See Jodi Kantor & Jeff Zeleny, *On Defensive, Obama Plans Talk on Race*, N.Y. TIMES, Mar. 18, 2008, at A1. Obama would later resign from his congregation after additional controversial remarks were made by a visiting Catholic priest. See Nia-Malika Henderson & Craig Gordon, *Breaking with Home Church, Illinois Senator Resigns to Sever Ties Officially*, NEWSDAY, June 1, 2008, at A03.

⁹ See *On the Trail*, NEWSDAY, Mar. 8, 2008, at A12. McCain would later reject the pastor's endorsement altogether. See Michael Luo, *McCain Rejects Hagee Backing as Nazi Remarks Surface*, CAUCUS: N.Y. TIMES POL. BLOG, May 22, 2008, <http://thecaucus.blogs.nytimes.com/2008/05/22/mccain-rejects-hagee-backing-as-nazi-remarks-surface>.

political pundits have declared the Catholic vote to be “in play,”¹⁰ and both nominees have touted the endorsements of prominent Catholics.¹¹

Into this fray step the United States bishops, with their effort to provide Catholics with a “foundation” that will enable them to better “evaluate policy positions, party platforms, and candidates’ promises and actions in light of the Gospel and the moral and social teaching of the Church in order to help build a better world.”¹² *Forming Consciences* is a thirty-seven-page document in three parts. Part I contains the bishops’ general reflections on Catholic teaching and political life. In particular, this part seeks to address four questions:

- Why Does the Church Teach About Issues Affecting Public Policy?
- Who in the Church Should Participate in Political Life?
- How Does the Church Help the Catholic Faithful to Speak About Political and Social Questions?
- What Does the Church Say About Catholic Social Teaching in the Public Square?—Seven Key Themes.¹³

¹⁰ Douglas Belkin, *Conservative-Catholic Voters May Be in Play*, WALL ST. J., May 29, 2008, at A6 (“For the first time since the presidential election of 1988, the observant white Catholic vote might be up for grabs this November. Conservative Catholics now appear to be more concerned about the economy and the war in Iraq, and less motivated by abortion, the issue that has long kept the voting bloc aligned with Republicans.”).

¹¹ See, e.g., Daniel Burke, *Obama Plans Full-Throttle Push for Evangelicals*, RELIGION NEWS SERVICE, June 18, 2008, http://www.religionnews.com/index.php?/rntext/obama_plans_full_throttle_push_for_evangelicals/ (“With the Democratic presidential nomination in his grasp, Sen. Barack Obama is making a full-throttle push for centrist evangelicals and Catholics.”); Liz Halloran, *McCain Is Fighting to Win the Catholic Vote*, U.S. NEWS, Mar. 12, 2008, <http://www.usnews.com/articles/news/campaign-2008/2008/03/12/mccain-is-fighting-to-win-the-catholic-vote.html> (“After televangelist John Hagee’s endorsement, McCain is trying to repair his relationship with the critical bloc And early this week, the McCain campaign announced that 100 prominent Catholics had joined the National Catholics for McCain Committee, headed by former GOP presidential candidate Sen. Sam Brownback. The committee, the campaign said, would recruit Catholics nationally.”); Douglas W. Kmiec, *Reaganites for Obama? Sorry, McCain. Barack Obama Is a Natural for the Catholic Vote*, SLATE, Feb. 13, 2008, <http://www.slate.com/id/2184378/>.

¹² *Forming Consciences*, *supra* note 4, ¶ 5.

¹³ *Id.* (tbl. of contents).

The “seven key themes” identified by the bishops are: (1) right to life and the dignity of the human person; (2) call to family, community, and participation; (3) rights and responsibilities; (4) option for the poor and vulnerable; (5) dignity of work and the rights of workers; (6) solidarity; and (7) caring for God’s creation.¹⁴

In Part II of the statement, the bishops turn from the general to the particular and seek to explain their “policy positions” in four areas—human life, family life, social justice, and global solidarity—so that voters can apply “Catholic teaching to major issues.”¹⁵ In Part III, the bishops get even more specific, setting forth ten policy “goals” and encouraging Catholics to “ask candidates how they intend to help our nation pursue these important goals.”¹⁶ This “top ten” list of sorts includes the following goals:

- Address the preeminent requirement to protect the weakest in our midst—innocent unborn children—by restricting and bringing to an end the destruction of unborn children through abortion.
- Keep our nation from turning to violence to address fundamental problems—a million abortions each year to deal with unwanted pregnancies, euthanasia and assisted suicide to deal with the burdens of illness and disability, the destruction of human embryos in the name of research, the use of the death penalty to combat crime, and imprudent resort to war to address international disputes.
- Define the central institution of marriage as a union between one man and one woman, and provide better support for family life morally, socially, and economically, so that our nation helps parents raise their children with respect for life, sound moral values, and an ethic of stewardship and responsibility.
- Achieve comprehensive immigration reform that secures our borders, treats immigrant workers fairly, offers an earned path to citizenship, respects the rule

¹⁴ See *id.* ¶¶ 44–54.

¹⁵ See *id.* ¶¶ 63–88.

¹⁶ *Id.* ¶ 90.

of law, and addresses the factors that compel people to leave their own countries.

- Help families and children overcome poverty: ensuring access to and choice in education, as well as decent work at fair, living wages and adequate assistance for the vulnerable in our nation, while also helping to overcome widespread hunger and poverty around the world, especially in the areas of development assistance, debt relief, and international trade.
- Provide health care for the growing number of people without it, while respecting human life, human dignity, and religious freedom in our health care system.
- Continue to oppose policies that reflect prejudice, hostility toward immigrants, religious bigotry, and other forms of discrimination.
- Encourage families, community groups, economic structures, and government to work together to overcome poverty, pursue the common good, and care for creation, with full respect for religious groups and their right to address social needs in accord with their basic moral convictions.
- Establish and comply with moral limits on the use of military force—examining for what purposes it may be used, under what authority, and at what human cost—and work for a “responsible transition” to end the war in Iraq.
- Join with others around the world to pursue peace, protect human rights and religious liberty, and advance economic justice and care for creation.¹⁷

Forming Consciences does not tell Catholics how to cast their votes.¹⁸ Nor could it. As a quick perusal of the above list makes clear, no single candidate or party has adopted a platform that is wholly consistent with the bishops’ policy goals.¹⁹ More

¹⁷ *Id.*

¹⁸ *See id.* ¶ 7 (“[W]e bishops do not intend to tell Catholics for whom or against whom to vote. Our purpose is to help Catholics form their consciences in accordance with God’s truth. . . . [T]he responsibility to make choices in political life rests with each individual in light of a properly formed conscience. . . .”).

¹⁹ Of course, even if there were a candidate whose positions were wholly in accord with Church teaching, the rules governing tax-exempt organizations

pragmatically, regardless of the candidates' and parties' official platforms, neither is likely to actively work for concrete programs that are consistent with all of the bishops' policy goals. That political reality can make *Forming Consciences* a frustrating document. It does not provide easy answers for Catholic voters—because there are no easy answers. As the bishops recognize: “Decisions about political life are complex and require the exercise of a well-formed conscience aided by prudence.”²⁰

Forming Consciences embraces this complexity. In contrast to more simplistic “guides” for Catholic voters that focus on a small group of “non-negotiables,”²¹ *Forming Consciences* presents a nuanced and pragmatic approach. As an example, consider the bishops' approach to abortion, which is the public issue probably most closely associated with the Catholic Church today, and is the issue in *Forming Consciences* that received the most attention in the popular press.²²

would still prevent the bishops from endorsing that candidate. See 26 U.S.C. § 501(c)(3) (2006) (requiring that tax-exempt organizations “not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office”).

²⁰ *Forming Consciences*, *supra* note 4, ¶ 31.

²¹ See, e.g., CATHOLIC ANSWERS ACTION, VOTER'S GUIDE FOR SERIOUS CATHOLICS 3 (2d ed. 2006). The *Voter's Guide for Serious Catholics* identifies five “non-negotiable” issues—things on which there is only one acceptable “side” for a conscientious Catholic. Those issues are abortion, euthanasia, fetal stem cell research, human cloning, and homosexual “marriage.” The guide proposes a simple methodology: Find out where each candidate stands on each of these issues. Eliminate from consideration any candidate who is wrong on any of the five issues. Vote for one of the remaining candidates. *Id.* at 3–8, 11. In a thinly veiled reference to the *Voter's Guide for Serious Catholics* and similar such publications, *Forming Consciences* notes the distribution of “many handouts and voter guides” during elections, but encourages Catholics “to seek those resources that are authorized by their own bishops, their state Catholic conferences, and the United States Conference of Catholic Bishops.” See *Forming Consciences*, *supra* note 4, ¶ 8.

²² Newspaper headlines the day after *Forming Consciences* was released provide an interesting view of the differing interpretations of the bishops' message about abortion. See, e.g., Associated Press, *Catholic Teaching Must Sway Elections, Bishops Say Worshippers Urged To Make Fighting Abortion a Priority*, GRAND RAPIDS PRESS, Nov. 15, 2007, at A3; Neela Banerjee, *Catholic Bishops Offer Voting Guide, Allowing Some Flexibility on Issue of Abortion*, N.Y. TIMES, Nov. 15, 2007, at A30; Ann Rogers, *Bishops: Abortion Isn't Voters' Only Issue; Catholics Adopt Moral Guidelines for Elections*, PITTSBURGH POST-GAZETTE, Nov. 15, 2007, at A1; Rachel Zoll, *Roman Catholic Voters Should Focus on Abortion, Bishops Say*, DESERET MORNING NEWS, Nov. 15, 2007, at A13.

On the one hand, the bishops recognize that all the various issues impacted by Catholic teaching are interconnected:

The right to life implies and is linked to other human rights—to the basic goods that every human person needs to live and thrive. All the life issues are connected, for erosion of respect for the life of any individual or group in society necessarily diminishes respect for all life. The moral imperatives to respond to the needs of our neighbors—basic needs such as food, shelter, health care, education, and meaningful work—is universally binding on our consciences and may be legitimately fulfilled by a variety of means.²³

On the other hand, the bishops make clear that among their public policy goals, restricting and eliminating abortion holds a special place:

Two temptations in public life can distort the Church's defense of human life and dignity:

The first is a moral equivalence that makes no ethical distinctions between different kinds of issues involving human life and dignity. The direct and intentional destruction of innocent human life from the moment of conception until natural death is always wrong and is not just one issue among many. It must always be opposed.²⁴

Yet, at the same time, the bishops warn against using the primacy of abortion as an excuse for ignoring other vital "life" issues:

The second [temptation in public life that can distort Church teaching] is the misuse of these necessary moral distinctions as a way of dismissing or ignoring other serious threats to human life and dignity. Racism and other unjust discrimination, the use of the death penalty, resorting to unjust war, the use of torture, war crimes, the failure to respond to those who are suffering from hunger or a lack of health care, or an unjust immigration policy are all serious moral issues that challenge our consciences and require us to act. These are not optional concerns which can be dismissed.²⁵

So where does this leave the Catholic voter who desires not only to develop a well-formed conscience, but also to choose a particular candidate? The bishops provide some additional guidance in their discussion of "intrinsic evils," but again the

²³ *Forming Consciences*, *supra* note 4, ¶ 25.

²⁴ *Id.* ¶¶ 27–28.

²⁵ *Id.* ¶ 29.

answer is nuanced and pragmatic. First, the bishops state clearly their view that some actions and policies—most notably those promoting abortion—are always wrong:

There are some things we must never do, as individuals or as a society, because they are always incompatible with love of God and neighbor. Such actions are so deeply flawed that they are always opposed to the authentic good of persons. These are called “intrinsically evil” actions. They must always be rejected and opposed and must never be supported or condoned. A prime example is the intentional taking of innocent human life, as in abortion and euthanasia.²⁶

Yet, the bishops also recognize that opposition to “intrinsic evils” will not always translate into a vote for a particular candidate. The bishops do make clear their view that a Catholic “cannot vote for a candidate who takes a position in favor of an intrinsic evil, such as abortion or racism, *if the voter’s intent is to support that position.*”²⁷ Implicit in that qualification is the recognition that there “may be times when a Catholic who rejects a candidate’s unacceptable position may decide to vote for that candidate for other morally grave reasons.”²⁸ The bishops also warn that “a voter should not use a candidate’s opposition to an intrinsic evil to justify indifference or inattentiveness to other important moral issues involving human life and dignity.”²⁹

To complicate matters further, the bishops implicitly recognize the distinction between a political “position” and the actual pursuit of policy goals.³⁰ This recognition leads the bishops to important conclusions. First, in deciding between two candidates, neither of whom supports positions fully in accord

²⁶ *Id.* ¶ 22. Other “intrinsic evils” identified by the bishops are “human cloning and destructive research on human embryos” and “[o]ther direct assaults on innocent human life and violations of human dignity, such as genocide, torture, racism, and the targeting of noncombatants in acts of terror or war.” *Id.* ¶ 23.

²⁷ *Id.* ¶ 34 (emphasis added).

²⁸ *Id.* ¶ 35 (adding that “[v]oting in this way would be permissible only for truly grave moral reasons, not to advance narrow interests or partisan preferences or to ignore a fundamental moral evil”).

²⁹ *Id.* ¶ 34.

³⁰ See *Forming Consciences*, *supra* note 4, ¶ 90. Although the bishops do not mention it, the obvious example here is the Republican Party’s official support for a (politically unlikely) constitutional amendment banning abortion. See 2004 Republican Party Platform: A Safer World and More Hopeful America (August 26, 2004), <http://www.gop.com/images/2004platform.pdf> (“We support a human life amendment to the Constitution and we endorse legislation to make it clear that the Fourteenth Amendment’s protections apply to unborn children.”).

with the voter's well-formed conscience, the voter "may decide to vote for the candidate deemed less likely to advance such a morally flawed position and more likely to pursue other authentic human goods."³¹ Second, the bishops note that it is essential for voters to take into account not just a candidate's official positions, but also the candidate's "commitments, character, integrity, and ability to influence a given issue."³²

If all this seems to leave unanswered the question of how a Catholic should vote (or, to be more blunt about it, whether a Catholic should vote for Barack Obama or John McCain), that is not an accident. While the bishops are clear in their desire to "participate in shaping the moral character of society," they also recognize that the "practical judgments" Catholics are called upon to make in the political arena are "complex" and, in the end, are decisions "to be made by each Catholic guided by a conscience formed by Catholic moral teaching" and aided "by the virtue of prudence."³³

In the pages that follow, six law professors join in the "faith-based conversation on social issues" begun by the bishops. Given the rich tradition of Catholic social thought and the complexity of our current political challenges, it is not surprising that their reactions to *Forming Consciences* are quite diverse.

Robert Araujo, S.J., begins the conversation by considering this deceptively simple question: "How is a well-formed conscience formed?"³⁴ In his essay, Araujo explores a central tension in the Catholic conception of conscience. On the one hand, conscience is personal. It is "the most secret core and sanctuary" where a person "is alone with God."³⁵ On the other hand, conscience cannot be purely subjective. It must use "faith and reason" to search for objective truth, with the Church's teaching as both the foundation for that truth and a key part on the personal "dialogue with God" that is at the core of conscience formation.³⁶ To illustrate his point, Araujo compares the vision of conscience in *Forming Consciences* with the vision of conscience

³¹ *Forming Consciences*, *supra* note 4, ¶ 35.

³² *Id.* ¶ 37.

³³ *Id.* ¶¶ 9, 21, 37.

³⁴ Robert John Araujo, S.J., *Forming the Well-Formed Conscience*, 47 J. CATH. LEGAL STUD. 219 (2008).

³⁵ *Id.* (quoting PAUL VI, PASTORAL CONSTITUTION ON THE CHURCH IN THE MODERN WORLD *GAUDIUM ET SPES* ¶ 16 (1965)).

³⁶ *Id.* at 103, 108.

endorsed by the Supreme Court in *Planned Parenthood of Southeastern Pennsylvania v. Casey*.³⁷ Araujo contrasts the subjectivism of *Casey*, which risks conscience being distorted by the demands and temptations of the “present material moment,” with the approach of St. Thomas More, whose famous exercise of conscience—his principled stand for objective truth—came at the ultimate material cost.³⁸

In the second essay, Elizabeth Brown more directly confronts the challenge of translating matters of consciences into actual votes.³⁹ Recognizing the complexity of this process, Brown contrasts the “over-compartmentalization” of issues that is typical in American politics with the “holistic” approach at least implicitly endorsed by *Forming Consciences*.⁴⁰ In Brown’s view, one of *Forming Consciences*’ major virtues is its rejection of the notion that Catholics should be “single-issue voters.”⁴¹ While this absence of “clean instructions” may leave some voters frustrated, Brown recognizes that there are “no easy answers.”⁴² Instead, the bishops’ approach requires “consideration of and balancing of a range of moral concerns,” and in particular requires Catholics to consider such issues as economic justice and the environment, in addition to the traditional “life” issues such as abortion and euthanasia.⁴³ In the end, Brown argues that a robust holistic approach will do more to advance the common good than the narrow issue-by-issue approach that defines current political discourse.⁴⁴

Robert Delahunty approaches these same issues—how to match a broad conception of social justice with a particular party or candidate—from the perspective of an evangelical Christian.⁴⁵ Delahunty first notes that the decades-long alliance between evangelicals and the Republican Party was forged first over the

³⁷ 505 U.S. 833, 851(1992) (“At the heart of liberty is the right to define one’s own concept of existence, of meaning, of the universe, and of the mystery of human life.”).

³⁸ See Araujo, *supra* note 34, at 225, 228–29.

³⁹ See Elizabeth F. Brown, *Trying to Vote in Good Conscience*, 47 J. CATH. LEGAL STUD. 239 (2008).

⁴⁰ *Id.* at 239, 241.

⁴¹ *Id.* at 270.

⁴² *Id.* at 254.

⁴³ *Id.* at 255.

⁴⁴ *Id.* at 270.

⁴⁵ See Robert J. Delahunty, *Changing Hearts, Changing Minds: A New Evangelical Politics?*, 47 J. CATH. LEGAL STUD. 271 (2008).

issue of abortion and then over the issues of gay rights and same-sex marriage. But now, Delahunty notes, there may be a new evangelical politics in the making: “Evangelicals will continue to put the protection of unborn life and the family at the center of their political agenda. But their agenda will come to include issues of peace, distributive justice, famine relief, environmental quality, and more.”⁴⁶ And while this broader focus on social justice may not sever the link between evangelicals and the Republican Party, it may cause the link to “strain and fray.”⁴⁷ Once cut loose from the single-issue politics that have bound them to one party, evangelicals will need to develop a “comprehensive, overarching . . . philosophy” that will enable them to confront the complex interrelated issues of global justice.⁴⁸ For evangelicals, that philosophy can be informed by the rich tradition of Catholic and other Christian thinking. But, true to its evangelical identity, it also must primarily be rooted in the Bible. Delahunty then begins to sketch, if not an outline, at least some possible sources for such an overarching, Biblically-based, comprehensive philosophy of social justice.

David Gregory’s reaction to *Forming Consciences* is more (and more bluntly) critical.⁴⁹ From his perspective as a Catholic labor lawyer, Gregory asks “whatever happened to *Economic Justice*?”⁵⁰ More particularly, he contrasts the “measured middle-of-the-road pragmatism” of *Forming Consciences* with the “courageous and inspirational” pastoral voice used by American bishops in their 1986 letter *Economic Justice for All*.⁵¹ Gregory’s core lament is that *Forming Consciences* “manifestly fails to challenge the unbridled and unprecedented corporate greed and exorbitant executive compensation in our age of pathologically gross and shameless materialism.”⁵²

The next essay takes a personal turn, as Susan Stabile attempts to explain how she, as a Catholic, will approach the presidential election.⁵³ Like most other participants in the

⁴⁶ *Id.* at 290.

⁴⁷ *Id.*

⁴⁸ *Id.* at 291.

⁴⁹ See David L. Gregory, *Not the Bishops’ Finest Hour: Economic Justice with Cerebus Unchained?*, 47 J. CATH. LEGAL STUD. 239 (2008).

⁵⁰ *Id.* at 295.

⁵¹ *Id.* at 296–98.

⁵² *Id.* at 296.

⁵³ See Susan J. Stabile, *One Catholic’s Thoughts on Voting for a President*, 47 J.

Symposium, Stabile sees complexity in her “effort to grapple with the serious challenges faced by our country in light of the guidance available” from the Church.⁵⁴ And, like most other participants in the Symposium, Stabile sees in *Forming Consciences* a call to move beyond single-issue voting.⁵⁵ Stabile then proposes a practical approach that transcends issues and seeks to implement the Church’s vision of a just society by focusing on a candidate’s ability to be a “moral leader.” Stabile defines a “moral leader” as someone who can “bring us to our higher good,” someone who can “unify rather than divide” God’s people (both at home and around the world), and someone whom we can trust.⁵⁶ From these parameters, Stabile articulates “concrete criteria” to evaluate presidential candidates: (1) whether the candidate seeks “to promote the dignity of the human person”; (2) whether the candidate seeks to “promote unity and inclusiveness”; and (3) whether the candidate can “promote understanding between cultures and, therefore, act as a promoter of peace throughout the world?”⁵⁷

In the final essay, Amy Uelmen emphasizes what is perhaps the most consistent theme in this Symposium. For the Catholic “who hopes to bring a mature contribution to political life,” there is no “simple formula.”⁵⁸ In short: “It’s hard work.” Uelmen views the bishops’ refusal to propose a “simple methodology” as the strength of *Forming Consciences*. To those who would prefer the moral clarity (and easy application) of “non-negotiables,” Uelmen argues that the simplistic approach inevitably ignores crucial issues, collapses a number of important steps in the moral and political analysis, and ignores the crucial question of the voter’s intent.⁵⁹ On the other side, to those who wish that the bishops included more socio-economic examples of “intrinsic evils,” Uelmen answers that the identification of a policy as an “intrinsic evil” (or not) is not the end of the analysis, but the beginning, because so many issues are interconnected.⁶⁰ In

CATH. LEGAL STUD. 303 (2008).

⁵⁴ *Id.* at 304.

⁵⁵ *Id.* at 305.

⁵⁶ *Id.* at 307–08.

⁵⁷ *Id.* at 310–14.

⁵⁸ See Amelia J. Uelmen, “*It’s Hard Work*”: Reflections on Conscience and Citizenship in the Catholic Tradition, 47 J. CATH. LEGAL STUD. 317, 342 (2008).

⁵⁹ *Id.* at 321–22.

⁶⁰ *Id.* at 338–39.

Uelmen's optimistic and unifying view, even the "fire and brimstone" rhetoric of "intrinsic evil" can be a "helpful vehicle for dialogue" about doing good, opposing evil, and working for "change where needed in *both* the Republican and Democratic party platforms."⁶¹ Uelmen's ultimate hope is that Catholics will be inspired to undertake the hard work required for faithful citizenship by the vision of a community of faith working together to find "political and social remedies to the problems of abortion, war, poverty and a host of other threats to human life and dignity."⁶²

It *is* hard work, and the answers are *not* easy. This Symposium does not purport to provide the answers. But it does seek to further the "faith-based conversation" that informs and enriches Catholic participation in the political life of our nation. And that conversation is one that should unify us, not divide us. For, as the bishops remind Catholic voters, whether we are Republicans or Democrats, whether our political passions are roiled by abortion and euthanasia or by poverty and unjust war, whether our focus on economic injustice is domestic or global, and whether our prudential approaches to these issues tend to the conservative or the liberal, we are in the end "not factions, but one family of faith fulfilling the mission of Jesus Christ."⁶³

⁶¹ *Id.* at 341.

⁶² *Id.* at 342.

⁶³ *Forming Consciences*, *supra* note 4, ¶ 29.

