

Hasn't the Issue of Same-Sex Marriage been Settled by the Supreme Court?

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“Just who do we think we are?”¹ This was Chief Justice Roberts’ response to the June 26, 2015 Supreme Court ruling in *Obergefell v. Hodges*, declaring that “The Fourteenth Amendment requires a State to license a marriage between two people of the same sex and to recognize a marriage between two people of the same sex when their marriage was lawfully licensed and performed out-of-State.”² The reason for Chief Justice Robert’s incredulity is that this ruling has officially changed the definition of marriage which, as Justice Kennedy noted during oral arguments, “has been with us for millennia.”³ If there remains any doubt that this is what has happened, then consider the words of Chief Justice Roberts to the petitioners during the Supreme Court oral arguments, “You’re not seeking to join this institution but [to] change what this institution is.”⁴

Make no mistake about it; marriage as it has always been understood and defined in every civilization and at all points in history until 15 years ago is now fundamentally altered in the eyes of the law. Nevertheless, we as Christians understand that marriage is a sacred act that is divinely defined and accomplished. As such, we have neither the right, nor the ability to redefine this institution in reality. Just because a father has the ability to require and enforce that his children refer to him as the President of the United States does not make him the president in reality. Likewise, just because the Supreme Court has redefined marriage and can enforce this definition does not make it legitimate in the eyes of the Creator God.

Jesus, as the Creator God, declared the purpose and nature of marriage to be the supernatural uniting together of a male and a female. [Matthew 19:4-7](#) says, “*He answered, ‘Have you not read that he who created them from the beginning made them male and female, and said, ‘Therefore a man shall leave his father and his mother and hold fast to his wife, and the two shall become one flesh’? So they are no longer two but one flesh. What therefore God has joined together, let not man separate.’*”

It is in circumstances such as this Supreme Court ruling that we as Christians need to be reminded of from where it is that we draw our definitions. We do not derive our definition of marriage from *Black’s Law Dictionary*. Rather, the Bible is our infallible and eternal standard for truth, and it is from the Bible that we derive our morality and our definition of marriage.

So, what exactly happened on June 26, 2015, and why did it divide the nation? To understand this, we must first understand what the Supreme Court was asked to decide upon. For some time, various

¹ Wax, “Top 10 Quotes from the Dissenting Justices on Same-sex Marriage.”

² “Supreme Court of the United States October Term 2014 Syllabus: OBERGEFELL ET AL. v. HODGES, DIRECTOR, OHIO DEPARTMENT OF HEALTH, ET AL.”

³ Barbash, “Supreme Court Hears Same-sex Marriage Case: Who Said what (with Audio).”

⁴ Ibid.

states had voted upon constitutional amendments designed to either open or close marriage to members of the same sex. In many of the instances where the people voted to protect the definition of marriage as being restricted to a man and a woman, the federal courts intervened. In the Fall of 2014, most of the states where same-sex marriage was legal were so as a result of judicial activism.

Prior to *Obergefell v. Hodges*, it was rarely reported that same-sex marriage had been voted into law by the will of the people. Instead, the news media consistently announced that same-sex marriage had been “legalized” in yet another state. The reason for this is that in nearly every state where same-sex marriage was legal before the Supreme Court’s ruling, it was so as the result of judicial activism. In fact, it was not until November 6, 2012 that the first state approved same-sex marriage through a constitutionally approved vote of the people. In other words, it was not until nearly the year 2013 that the very first state in America legalized same-sex marriage by popular vote rather than through judicial activism. Understanding this, it is amazing that only two years later the Supreme Court “discovered” that same-sex marriage has always been a fundamental right protected by the Constitution of the United States of America. In any event, consider some excerpts from the November 7, 2012 *CNN* article titled “Voters Approve Same-sex Marriage for the First Time”:⁵

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In a historic turnaround, the ballot box is showing America’s shifting attitudes about same-sex marriage. After gay marriage rights died at the polls dozens of times in the past, on Tuesday they passed in at least two states.

Rarely do popular votes reflect such dramatic social changes.

The result: Maryland and Maine will now allow couples like Chyrino Patane and James Trinidad to tie the knot. ... But the win was hard fought and the margin of victory was small.

“We’ve lost at the ballot box 32 times,” said Paul Guequierre of Human Rights Campaign. ... In Maryland, where just 51.9% of voters approved gay marriage rights, “It was a little bit pins and needles,” said Human Rights Campaign’s Kevin Nix. “It was going to be a close call all along.” ... In 2009, a similar referendum in Maine failed when voters rejected the governor’s decision to allow same-sex marriage. Tuesday’s results represent a remarkable turnaround. ... Thirty-eight states have passed bans on marriages between people of the same gender, mostly by amending their constitutions to define marriage as a union between a man and a woman.

In the six states – Massachusetts, Connecticut, Iowa, Vermont, New Hampshire and New York – and the District of Columbia where gays and lesbians have previously won marriage rights, it was because of actions taken by judges or legislators, not voters.

⁵ Brumfield, “Voters Approve Same-sex Marriage for the First Time.”

Because of this judicial activism which repeatedly overturned the democratic process and state constitutional amendments, those opposed to same-sex marriage wanted the Supreme Court to overrule these federal courts of appeals. Interestingly enough, supporters of same-sex marriage also wanted the Supreme Court to decide the issue because they saw an opportunity to forcibly legalize same-sex marriage in every state via one court ruling rather than continue the drawn out appeals process. Despite the fact that both parties wanted the Supreme Court to hear the case, the Supreme Court refused to hear cases from three federal courts of appeals on the matter of same-sex marriage. Because of this, on October 6, 2014, *The Atlantic* ran the headline “The Same-sex Marriage Fight Is Over: By Refusing to Take a Stand on Lower-court Decisions, the Justices have Effectively Settled the Fight—in favor of gays and lesbians who want to marry.”⁶

Since every federal court of appeals ruling prior to this point had been in favor of same-sex marriage, the Supreme Court had essentially legalized same-sex marriage in 2014 with a *de facto* ruling. Because of this failure to rule—which was little less than a ruling in-and-of-itself—all pending appeals were essentially considered to be concluded in favor of same-sex marriage. Within a single day, our nation jumped from same-sex marriage being legal in 19 states to it being essentially legal in 30 states. As for the remaining states, the Supreme Court had issued a virtual directive ordering them to follow suit, or the federal courts of appeals would forcibly overturn their laws. For all practical purposes, *The Atlantic* was correct when it declared “The Same-sex Marriage Fight is Over.”⁷

Of such significance were the implications of the Supreme Court’s decision not to rule on this issue that journalist Brit Hume declared the issue of same-sex marriage to be politically dead,⁸ and president of Southern Theological Seminary Albert Mohler warned that we would soon witness attempts by the Republican Party to synthesize their “values” with this new reality. Overnight, advocates of traditional marriage lost their voice, and a new reality was quickly forming ... and then the Sixth Circuit Court of Appeals shocked the nation.

Months earlier, the states of Michigan, Ohio, Kentucky, and Tennessee appealed to the Sixth Circuit Court their right to ban same-sex marriage in their respective states.⁹ In November of 2014, the Sixth Circuit Court upheld these states’ right to ban same-sex marriage. Of course, this was a federal court decision in direct contradiction to the other federal court decisions. As such, our nation now had an official Constitutional crisis which necessitated the involvement of the Supreme Court. Therefore, the Supreme Court agreed to consider two questions:

- Does the 14th Amendment to the Constitution require a state to license a marriage between two people of the same sex?
- Does the 14th Amendment to the Constitution require a state to recognize a marriage between two people of the same sex when their marriage was lawfully licensed and performed out-of-state?¹⁰

⁶ Epps, “The Same-sex Marriage Fight is Over.”

⁷ Ibid.

⁸ “Brit Hume: The Issue of Gay Marriage is Now Politically Dead.”

⁹ Myers, “Gay Marriage Arguments are Flooding Federal Courts.”

¹⁰ Barbash, “Supreme Court Hears Same-sex Marriage Case: Who Said what (with Audio).”

In answer to these two questions, the Supreme Court has ruled, “The Fourteenth Amendment requires a State to license a marriage between two people of the same sex and to recognize a marriage between two people of the same sex when their marriage was lawfully licensed and performed out-of-State.”¹¹ They ruled in favor of same-sex marriage on both counts, and this ruling was nearly the worst-case scenario for those who supported a traditional definition of marriage. According to the Supreme Court, the U.S. Constitution guarantees a right to same-sex marriage. Consider one excerpt from the Supreme Court majority opinion, “The right to marry is a fundamental right inherent in the liberty of the person, and under the Due Process and Equal Protection Clauses of the Fourteenth Amendment couples of the same-sex may not be deprived of that right and that liberty. Same-sex couples may exercise the fundamental right to marry.”¹²

So, what does this mean for Christians? The implications of this ruling are enormous and widespread, so we will focus our attention on only a few of them. In the first place, this was a deeply divided decision by the Supreme Court with five Justices ruling in favor of the petitioners and four Justices opposed. It may have been the Court’s intention to settle this issue and to put an end to the debate, but this decision will not end the dispute.¹³ More than 40 years ago, the Supreme Court attempted to settle the issue of abortion in the case of *Roe v. Wade*. Instead, the issue of abortion has been a key debate in nearly every subsequent campaign for political high office. In the same way, the debate over whether same-sex marriage is morally acceptable will continue regardless of this ruling.

President of Southern Theological Seminary Albert Mohler in his daily podcast *The Briefing* noted that at the heart of this appeal by the homosexual community was not a desire to legalize same-sex marriage. At the heart of this appeal was a desire to be morally affirmed and accepted. But this, of course, is not something the Supreme Court is capable of accomplishing.¹⁴ As such, both parties are almost certain to be disappointed by this ruling. However, in the process, the Supreme Court has fundamentally altered the fabric of our society and has redefined how the Constitution is to be interpreted, and how the law is to be upheld. In the words of Justice Antonin Scalia:¹⁵

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This is a naked judicial claim to legislative—indeed, super-legislative—power; a claim fundamentally at odds with our system of government. Except as limited by a constitutional prohibition agreed to by the People, the States are free to adopt whatever laws they like, even those that offend the esteemed Justices’ “reasoned judgment.” A system of government that makes the People subordinate to a committee of nine

¹¹ “Supreme Court of the United States October Term 2014 Syllabus: OBERGEFELL ET AL. v. HODGES, DIRECTOR, OHIO DEPARTMENT OF HEALTH, ET AL.”

¹² Ibid.

¹³ According to *Religion News Service*, “Alabama’s probate courts may not issue marriage licenses to same-sex couples, the chief justice of the Alabama Supreme Court has ordered. Chief Justice Roy Moore ruled Wednesday (Jan. 6) that Alabama’s Marriage Protection Act, which bars such unions, remains ‘in full force and effect’ despite a June ruling by the U.S. Supreme Court that struck down similar laws banning same-sex marriage in Kentucky, Michigan, Ohio and Tennessee, according to USA Today.” (Grossman, “Alabama Chief Justice Defies Supreme Court Gay Marriage Ruling, Forbids Clerks to Issue Licenses.”)

¹⁴ Mohler, “The Briefing Special Edition: Supreme Court Ruling on Same Sex Marriage.”

¹⁵ Soave, “Scalia’s Angry, Incoherent Gay Marriage Dissent.”

unelected lawyers does not deserve to be called a democracy.

In his dissent, Chief Justice John Roberts declared, “The majority’s decision is an act of will, not legal judgment... The Court invalidates the marriage laws of more than half the States and orders the transformation of a social institution that has formed the basis of human society for millennia, for the Kalahari Bushmen and the Han Chinese, the Carthaginians and the Aztecs. Just who do we think we are?”¹⁶ Similarly, Justice Scalia wrote:¹⁷

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But what really astounds is the hubris reflected in today’s judicial Putsch.¹ The five Justices who compose today’s majority are entirely comfortable concluding that every State violated the Constitution for all of the 135 years between the Fourteenth Amendment’s ratification and Massachusetts’ permitting of same-sex marriages in 2003. They have discovered in the Fourteenth Amendment a “fundamental right” overlooked person alive at the time of ratification, and almost everyone else in the time since... These Justices know that limiting marriage to one man and one woman is contrary to reason; they know that an institution as old as government itself, and accepted by every nation in history until 15 years ago, cannot possibly be supported by anything other than ignorance or bigotry. And they are willing to say that any citizen who does not agree with that, who adheres to what was, until 15 years ago, the unanimous judgment of all generations and all societies, stands against the Constitution.

Another implication of this ruling is that it opens the door to a host of additional legal and moral questions. One such example is the issue of polyamory, which is defined on Merriam-Webster.com as “The state or practice of having more than one open romantic relationship at a time.”¹⁸ Polygamy is a sub-set of polyamory. For years, the mainstream media has run stories on the issue of polyamory, and shows such as *Oprah* have interviewed people in polyamorous relationships. Today polyamory is making appearances in gay pride parades, is a popular theatre theme, and is becoming increasingly popular in both movies and television shows. It has appeared in movies such as *Her*, *Breaking Upwards*, and Oliver Stone’s *Savages*. Fox’s reality TV show *Utopia* includes a cast member who is both bisexual and polyamorous. Outside of the show, she lives with her two boyfriends and girlfriend. TLC’s *Sister Wives* has proven to be so popular that TLC is now producing *My Five Wives*. Similarly, Showtime airs *Polyamory: Married and Dating*; HBO airs *Big Love*; and ABC airs *Wife Swap* and *Celebrity Wife Swap*. Even non-poly-themed shows such as *The Glades* are

¹⁶ Wax, “Top 10 Quotes from the Dissenting Justices on Same-sex Marriage.”

¹⁷ Wax, “Top 10 Quotes from the Dissenting Justices on Same-sex Marriage.”

¹⁸ “Polyamory.”

introducing polyamory education into their shows. Of course, this is the natural progression of shows which have long introduced viewers to open relationships, threesomes, and other poly-like relationships. With this in mind, consider the words of Chief Justice Roberts in his dissent:¹⁹

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It is striking how much of the majority’s reasoning would apply with equal force to the claim of a fundamental right to plural marriage. If “[t]here is dignity in the bond between two men or two women who seek to marry and in their autonomy to make such profound choices,” why would there be any less dignity in the bond between three people who, in exercising their autonomy, seek to make the profound choice to marry? If a same-sex couple has the constitutional right to marry because their children would otherwise “suffer the stigma of knowing their families are somehow lesser,” why wouldn’t the same reasoning apply to a family of three or more persons raising children? If not having the opportunity to marry “serves to disrespect and subordinate” gay and lesbian couples, why wouldn’t the same “imposition of this disability,” serve to disrespect and subordinate people who find fulfillment in polyamorous relationships?

The subject of homosexuality is merely a catalyst ushering in numerous other issues. Some of these other issues will soon vie for the same recognition afforded to same-sex couples, and the Supreme Court’s ruling almost ensures that they will eventually be granted the same rights and privileges.

Perhaps the most disturbing of all the implications of *Obergefell v. Hodges* relates to religious liberty. Responding to this decision, Justice Thomas said there are “potentially ruinous consequences for religious liberty.”²⁰ In part, this is because the language of the ruling itself indicates that religious liberties may not find legal refuge in the near future. According to Chief Justice Roberts:²¹

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The majority graciously suggests that religious believers may continue to “advocate” and “teach” their views of marriage. The First Amendment guarantees, however, the freedom to “exercise” religion. Ominously, that is not a word the majority uses. Hard questions arise when people of faith exercise religion in ways that may be seen to conflict with the new right to same-sex marriage—when, for example, a religious college provides married student housing only to opposite-sex married couples, or a religious adoption agency declines to place children with same-sex married couples... Unfortunately, people of faith can take no comfort in the treatment they receive from the majority today.

¹⁹ Wax, “Top 10 Quotes from the Dissenting Justices on Same-sex Marriage.”

²⁰ Ibid.

²¹ Ibid.

The threat to religious liberties was even admitted to during the Supreme Court oral arguments. Justice Samuel Alito asked if religious schools could have their tax-exempt status revoked for refusing housing to same-sex couples. In response, the President’s lawyer answered, “You know, I don’t think I can answer that question without knowing more specifics but it’s certainly going to be an issue. I, I don’t deny that. I don’t deny that, Justice Alito. It is, it is going to be an issue.”²²

If there is any doubt what-so-ever whether religious liberties will come under assault as a result of this ruling, then one need look no further than the Fall of 2014 when it was widely believed that the advocates of same-sex marriage had won the debate. Within weeks of the Supreme Court’s *de facto* ruling, there was an attempt to force ministers in Idaho to perform a same-sex wedding ceremony,²³ there was an effort to bully Christian colleges into accepting homosexual behavior or risk losing government funding,²⁴ and the sermons of pastors who opposed a transgender bill in Houston, Texas were subpoenaed by the city for evaluation.²⁵ These affronts to religious liberty were somewhat curtailed by the ruling of the Sixth Circuit Court of Appeals. Nevertheless, when the gay activists believed themselves to be the victors we may have been granted a glimpse into our future.

Subsequent to the Supreme Court ruling in *Obergefell v. Hodges*, a county clerk in Rowan, Kentucky named Kim Davis was jailed for refusing to defy her religious convictions by issuing marriage licenses to same-sex couples. *The New York Times* reported, “A Kentucky county clerk who has become a symbol of religious opposition to same-sex marriage was jailed Thursday after defying a federal court order to issue marriage licenses to gay couples.”²⁶ Senator Ted Cruz responded by declaring, “Today, judicial lawlessness crossed into judicial tyranny. Today, for the first time ever, the government arrested a Christian woman for living according to her faith. ... Those who are persecuting Kim Davis believe that Christians should not serve in public office. That is the consequence of their position. Or, if Christians do serve in public office, they must disregard their religious faith—or be sent to jail.”²⁷ In contrast, President Barak Obama responded by placing homosexual rights above religious liberty. In an article titled “Obama Warns Christians: Gay Rights More Important than Religious Freedom,” *Breitbart* reported:²⁸

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As Pope Francis flew back to Rome, President Obama issued a stern warning to Christians, warning them their attempts to assert their religious liberty to oppose gay rights would fail. “We affirm that we cherish our religious freedom and are profoundly respectful of religious traditions,” he insisted during a dramatic speech at a LGTB fundraiser in New York City on Sunday night, praising the progress made on gay rights under his administration. “But we also have to say clearly that our religious freedom doesn’t grant us the freedom to deny our fellow Americans their constitutional rights.”

²² Smith, “Supreme Court Gay Marriage Ruling Could Create Religious Liberty Issues for Christian Schools, Charities, Obama’s Lawyer Admits.”

²³ “Govt Tells Christian Ministers: Perform Same-sex Weddings or Face Jail, Fines.”

²⁴ Haverluck, “Christian College’s ‘Gay’ Dilemma in a Post-Christian Society.”

²⁵ Sanburn, “Houston’s Pastors Outraged after City Subpoenas Sermons over Transgender Bill.”

²⁶ Blinder, “Clerk in Kentucky Chooses Jail over Deal on Same-sex Marriage.”

²⁷ Cruz, “Statement on Arrest of Kentucky Clerk Kim Davis.”

²⁸ Spierling, “Obama Warns Christians: Gay Rights More Important than Religious Freedom.”

So, what can we learn from all this? As Georgetown Law Professor Chai Feldblum said, “Protecting one group’s identity liberty may, at times, require that we burden other’s belief liberties.”²⁹ As Christians, we should expect that the window of opportunity to openly speak into the issue of homosexuality from a Biblical perspective will begin closing in the near future. If anything, this should motivate us to educate ourselves on this subject, to share with our loved ones, and to be an influence within our communities while we still have religious liberty. All-the-while, we ought to be gearing up for persecution.

As an illustration of this, consider the country of Canada. Today in Canada, pastors can be arrested and charged with a hate crime merely for reading from the Bible those passages that condemn homosexuality. Surely Canadian pastors wish today that they had seized the opportunity to teach into this issue in their churches when they still had the freedom to do so. Surely Canadian families wish that they had availed themselves of the literature that declared the truth of this lifestyle when they had the opportunity. We can learn from the experience of the Canadians, among others, and maximize the time that we have to educate ourselves on this subject, to share with our loved ones, and to be an influence in our communities while we still have religious liberty.

As Christians, we should anticipate that our voice in society will become increasingly unacceptable. In the opinion of many, our time for deliberation and debate over the issue of same-sex marriage—and with it, homosexuality in general—ended on June 26, 2015. It is now expected that we will get on board with the “majority” and accept their arguments as valid. As such, we should be determining today where we will personally draw the line. The ruling on June 26, 2015 will influence school curriculum, employment policies, health care, public events, and many other areas of everyday life. Knowing that things are not likely to get any easier, we should determine today how we will respond when we are faced with choosing between our moral convictions and our job, our moral convictions and our child’s education, our moral convictions and ... (fill in the blank).

Finally, we should recognize that the Supreme Court’s ruling begins a new chapter in our resistance of accepting the practice of homosexuality. It did not finish the fight. As mentioned earlier, the ruling of *Roe v. Wade* did not finish the dispute over abortion. It certainly changed the dynamics of the debate, but it did not settle the debate. Instead, Americans remain divided on the issue, and recent legislation is making it nearly impossible for abortion clinics to remain open in some states.³⁰ The fight over abortion has changed, but it continues. Similarly, our fight against accepting homosexuality as an acceptable practice will necessarily change, but it also continues. As Dr. Albert Mohler wrote in his response to the Supreme Court’s ruling:³¹

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Everything has changed and nothing has changed. ... We must contend for marriage as God’s gift to humanity – a gift central and essential to human flourishing and a gift that is limited to the conjugal union of a man and a woman. We must contend for religious liberty for all, and focus our energies on protecting the rights of Christian citizens and

²⁹ Brown, *A Queer Thing Happened to America*, 502.

³⁰ Lipka, “5 Facts about Abortion.”

³¹ Mohler, “Everything has Changed and Nothing has Changed – The Supreme Court Legalizes Same-sex Marriage.”

Christian institutions to teach and operate on the basis of Christian conviction.

We cannot be silent, and we cannot join the moral revolution that stands in direct opposition to what we believe the Creator has designed, given, and intended for us. We cannot be silent, and we cannot fail to contend for marriage as the union of a man and a woman.

In one sense, everything has changed. And yet, nothing has changed. The cultural and legal landscape has changed, as we believe this will lead to very real harms to our neighbors. But our Christian responsibility has not changed. We are charged to uphold marriage as the union of a man and a woman and to speak the truth in love. We are also commanded to uphold the truth about marriage in our own lives, in our own marriages, in our own families, and in our own churches.

We are called to be the people of the truth, even when the truth is not popular and even when the truth is denied by the culture around us. Christians have found themselves in this position before, and we will again. God's truth has not changed. The Holy Scriptures have not changed. The Gospel of Jesus Christ has not changed. The church's mission has not changed. Jesus Christ is the same, yesterday, today, and forever.

Works Cited

- Barbash, Fred, Mark Berman, and Sandhya Somashekhar. "Supreme Court Hears Same-sex Marriage Case: Who Said what (with Audio)." *The Washington Post*, April 28, 2015. Accessed June 27, 2015. <http://www.washingtonpost.com/news/post-nation/wp/2015/04/28/supreme-court-hears-arguments-in-same-sex-marriage-case-obergefell-v-hodges-today/>.
- Blinder, Alan, and Tamara Lewin. "Clerk in Kentucky Chooses Jail over Deal on Same-sex Marriage." *The New York Times*, September 3, 2015. Accessed November 2, 2015. <http://www.nytimes.com/2015/09/04/us/kim-davis-same-sex-marriage.html>.
- "Brit Hume: The Issue of Gay Marriage is Now Politically Dead." *The Right Scoop*, October 6, 2014. Accessed June 27, 2015. <http://therightscoop.com/brit-hume-the-issue-of-gay-marriage-is-now-politically-dead/>.
- Brown, Michael. *A Queer Thing Happened to America*. Concord: EqualTime Books, 2011.
- Brumfield, Ben. "Voters Approve Same-sex Marriage for the First Time." *CNN*, November 7, 2012. Accessed June 27, 2015. <http://www.cnn.com/2012/11/07/politics/pol-same-sex-marriage/>.
- Cruz, Ted. "Statement on Arrest of Kentucky Clerk Kim Davis." Ted Cruz 2016. Accessed November 2, 2015. <https://www.tedcruz.org/news/cruz-i-call-upon-every-believer-every-constitutionalist-every-lover-of-liberty-to-stand-with-kim-davis/>.
- Epps, Garrett. "The Same-sex Marriage Fight is Over." *The Atlantic*, October 6, 2014. Accessed June 27, 2015. <http://www.theatlantic.com/politics/archive/2014/10/The-Same-Sex-Marriage-Fight-Is-Over/381146/>.
- "Govt Tells Christian Ministers: Perform Same-sex Weddings or Face Jail, Fines." *Alliance Defending Freedom*, October 18, 2015. Accessed June 27, 2015. <http://www.adfmedia.org/News/PRDetail/9364>.
- Grossman, Cathy. "Alabama Chief Justice Defies Supreme Court Gay Marriage Ruling, Forbids Clerks to Issue Licenses." *Religion News Service*, January 6, 2016. Accessed January 20, 2016. <http://www.religionnews.com/2016/01/06/ala-chief-justice-defies-supreme-court-gay-marriage-ruling-forbids-clerks-to-issue-licenses/>.
- Haverluck, Michael. "Christian College's 'Gay' Dilemma in a Post-Christian Society." *One News Now*, November 15, 2014. Accessed June 27, 2015. <http://www.onenewsnow.com/education/2014/11/15/christian-college%E2%80%99s-%E2%80%98gay%E2%80%99-dilemma-in-a-post-christian-society#.VU-cBk0tHIU>.

- Lipka, Michael. "5 facts About Abortion." *Pew Research Center*, June 11, 2015. Accessed January 20, 2016. <http://www.pewresearch.org/fact-tank/2015/06/11/5-facts-about-abortion/>.
- Mohler, Albert. "Everything has Changed and Nothing has Changed - The Supreme Court Legalizes Same-sex Marriage." *AlbertMohler.com*, June 26, 2015. Accessed June 27, 2015. <http://www.albertmohler.com/>.
- Mohler, Albert. "The Briefing Special Edition: Supreme Court Ruling on Same Sex Marriage." *The Briefing*, June 26, 2015. Accessed June 27, 2015. <http://www.albertmohler.com/2015/06/26/the-briefing-special-edition-supreme-court-ruling-on-same-sex-marriage/>.
- Myers, Amanda. "Gay Marriage Arguments are Flooding Federal Courts." *The Huffington Post*, August 5, 2014. Updated October 5, 2014. Accessed June 27, 2015. http://www.huffingtonpost.com/2014/08/05/gay-marriage-courts_n_5651202.html.
- Sanburn, Josh. "Houston's Pastors Outraged after City Subpoenas Sermons over Transgender Bill." *Time*, October 17, 2014. Accessed October 18, 2014. <http://time.com/3514166/houston-pastors-sermons-subpoenaed/>.
- Smith, Samuel. "Supreme Court Gay Marriage Ruling Could Create Religious Liberty Issues for Christian Schools, Charities, Obama's Lawyer Admits." *The Christian Post*, April 29, 2015. <http://www.christianpost.com/news/supreme-court-gay-marriage-ruling-could-create-religious-liberty-issues-for-christian-schools-charities-obamas-lawyer-admits-138417/>.
- Soave, Robby. "Scalia's Angry, Incoherent Gay Marriage Dissent." *Hit and Run Blog*, June 26, 2015. Accessed June 27, 2015. <http://reason.com/blog/2015/06/26/scalias-angry-incoherent-gay-marriage-di>.
- Spierling, Charlie. "Obama Warns Christians: Gay Rights More Important than Religious Freedom." *Breitbart*, September 28, 2015. Accessed November 2, 2015. <http://www.breitbart.com/big-government/2015/09/28/obama-warns-christians-gay-rights-important-religious-freedom/>.
- "Supreme Court of the United States October Term 2014 Syllabus: OBERGEFELL ET AL. v. HODGES, DIRECTOR, OHIO DEPARTMENT OF HEALTH, ET AL." Supreme Court of the United States. Accessed June 27, 2015. http://www.supremecourt.gov/opinions/14pdf/14-556_3204.pdf.
- Wax, Trevin. "Top 10 Quotes from the Dissenting Justices on Same-Sex Marriage." *The Gospel Coalition*, June 26, 2015. Accessed June 26, 2015. <http://www.thegospelcoalition.org/blogs/trevinwax/2015/06/26/top-10-quotes-from-the-dissenting-justices-on-same-sex-marriage/>.

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