

THE INTERNATIONAL POLITICS OF RELIGIOUS FREEDOM

ELIZABETH SHAKMAN HURD

In the United States, religious freedom is often described as the 'first freedom', a fundamental human right, and a *sine qua non* of modern democratic politics, if not of civilisation itself. Americans, we are told, invented and perfected religious freedom. It is ready for export. And exporting it we are. A rapidly escalating number of actors are promoting religious freedom across state boundaries. Some are American, but many are not. Some are state-sponsored, but others are not. Legal guarantees of religious freedom are embedded as riders in trade agreements, in aid packages and in humanitarian projects. Diplomats are taught how to persuade their counterparts to safeguard religious freedom. Foreign policy establishments are formalising its promotion. The most recent example is Canada, where Prime Minister Stephen Harper announced that his government is creating an Office of Religious Freedom (ORF) at the Department of Foreign Affairs and International Trade (DFAIT), modelled on the US' Office of International Religious Freedom (OIRF) in the Department of State. The European Union (EU) is promoting religious freedom in its external affairs programming, adding clauses to bilateral trade agreements with North African and Central Asian trading partners that guarantee a commitment to religious freedom. In Europe, initiatives to train EU diplomats in religious freedom promotion are in the works. Again, the emphasis is on formalising religious freedom advocacy by public authorities. At the United Nations, the Office of the High Commissioner for Human Rights (HCHR) is in its third decade of promoting religious freedom and has initiated a campaign to combat incitement to religious hatred. This office has a large bureaucracy led by the Special Rapporteur on Freedom of Religion

or Belief, appointed by the UN Human Rights Council. It focuses on ensuring state compliance with human rights norms and standards developed over the past 60 years and embodied in declarations such as the 1948 Universal Declaration of Human Rights.

The promotion of religious freedom is ubiquitous. And it is not only by evangelicals. An impressive array of institutions and public authorities across the political spectrum, secular and religious, have taken up the cause. Religious freedom is fast becoming a language used to garner international political legitimacy. When the Moroccan Justice and Development Party won the November 2011 parliamentary elections, prominent party member and future Minister of Justice and Liberties Mustafa Ramid underlined the party's commitment to religious freedom: 'We have a progressive approach to Islam. The Islamicisation of Morocco will be achieved only by re-establishing justice and religious freedom' (Mekhennet, 2011).

Over the past two decades, the right to religious freedom has become what Lila Abu-Lughod calls a 'dialect of universality' (2010: 87). Religious freedom is 'being disseminated through international institutions and practices so that it is, to some extent, everywhere—translated, resisted, vernacularised, invoked in political struggles, and made the standard language enforced by power' (ibid.: 85). Like human rights, religious freedom has, in some sense, captured the field of emancipatory possibility. It stands for the good and the right in many difficult and often violent situations. It is easy to be swept up in the collective commonsense that guaranteeing religious freedom is what stands between us and pre-modern orders based on tyrannical forms of religious authority that leave women and minorities in the dust. Positioned as the only alternative to these unappealing options, it is hardly surprising that religious freedom projects, pronouncements and policies have gathered such momentum. In all of the excitement surrounding religious freedom as a universal norm—who can be against religious freedom? It is easy to forget that these are political projects that are situated in history and implemented by powerful state and global authorities. It is easy to overlook the fact that religious freedom is a site of politics, even of what Beaman and Sullivan (2013) have recently described as 'religious establishment'. The promotion of religious freedom is not a story of the progressive global dissemination of a universal norm and legal standard. We need to distinguish between an abstract

and aspirational state of peaceful religious coexistence, and the official practice of promoting religious freedom. While the former is certainly desirable, it is not the case that the latter actually helps to realise it, and, as I will suggest, it may actively impede it.

This paper steps back from the excitement and the anxiety surrounding the frenzied promotion of religious freedom to explore three paradoxes of religious freedom. I then ask whether the world created by religious freedom is a world we want to live in, drawing on the example of Syria, and then discussing a current lawsuit against one of the US bureaucracies created to promote and protect religious freedom globally. If religious freedom is not the answer, then what other possibilities are there for negotiating across deep lines of social and religious difference? Where might we look to find peaceful coexistence being imagined without religious freedom, as it is commonly understood today?¹

CRISIS IN SYRIA

Calls for the protection of persecuted Christians in Syria and around the Middle East have been a cornerstone of US and European foreign policy in the wake of the uprisings. There are serious concerns here. But a closer look at how this problem has been framed and the consequences of this framing reveals that, paradoxically, framing the problem in Syria as a crisis of religious freedom may help to *create* the very problems that religious freedom seeks to resolve.²

Christian Solidarity International (CSI) has lobbied President Obama to urge Ban Ki-moon to declare a genocide warning for Christians across the Middle East. Howard Berman of the House Foreign Affairs Committee (HFAC) says that the future of minorities is 'on our agenda as we figure out how to help these countries and their treatment of Christians and other minorities is a "red line" that will affect future aid' (Dorell and Lynch, 2012). Habib Malik of the Lebanese American University calls for Western nations to stand up for the rights of Christians, who, he says, may be cleansed from lands where democratic elections are used to oppress minorities rather than empower them. While this must be done, he says, 'in a way that is not misperceived on the other end, the West should not be cowed'.³ *USA Today* reports that 'Christians in Syria, where Muslims have risen up against President Bashar Assad, have been subjected to murder, rape and kidnappings in Damascus and rebellious towns'.

The momentum builds. The logic of this story is clear: when ‘Muslims rise up against Assad’, the result is Christian persecution. But the problem is that the Syrian protests are not captured by the notion of ‘Muslims rising up against Assad’, just as the protests in Bahrain are not captured by the notion of ‘Shi’a rising up against Sunnis’. This is what these regimes want us to believe. For decades, the Assads have relied on the threat of sectarian anarchy lurking just below the surface to justify autocratic rule. When the media, government officials and other public figures frame the revolt not as a popular uprising against a secular autocracy, but as an armed sectarian conflict pitting Sunnis against Alawites and their Shi’ite allies (Iran and Hezbollah), it hardens lines of religious difference. It brings these lines to the surface, accentuates and aggravates them. This makes sectarian violence more likely. It makes the regime’s argument that it is the only bulwark against sectarian warfare a la Lebanon and Iraq more plausible. This framing of the conflict energises categories of religious difference—Christian, Alawite, Sunni—that might not otherwise necessarily define it.

Like people everywhere, however, Syrians hold multiple allegiances, often celebrate diverse traditions, are frequently of mixed backgrounds, and do not always fit into the rubric of religious identity demanded by the sectarian assumptions of religious freedom discourse. Left out in the cold, these ‘in-between’ individuals find themselves in the impossible position of having to make political claims on religious grounds, or having no grounds from which to speak (Castelli, 2007: 684). This process of silencing is the first paradox of religious freedom.

To suggest that conflict stems from a failure to acknowledge the rights of believers conceals the ways in which social divisions cut across sectarian divides. It obscures the ways forward that emerge when the focus is not on beliefs or communities of believers, but rather on shared human needs and visions. The crisis in Syria calls for an approach to protecting human dignity that goes beyond calls for freedom of belief, and that loosens the grip of this construct on the political framing of the conflict.

Of course, the logic of sectarianism extends far beyond Syria. Calls for the protection of persecuted minorities have been a defining feature of the political landscape across the Middle East. A similarly tragic trajectory has taken hold in Bahrain, where an embattled

regime challenged by both Shi'a and Sunni dissenters has framed the conflict as sectarian, mobilising Sunni against Shi'a on the claim that the latter are controlled by a predatory Iran.⁴ As Joost Hiltermann (2012) argues:

by whipping up sectarian sentiments, the [Bahraini] government hopes to change the perception of the conflict from one that pits a popular pro-democracy movement against an authoritarian regime to one of a sectarian struggle between Sunni and Shia, with the strong government needed to maintain order.

In Syria, Bahrain and elsewhere, the everyday realities and ambiguities that shape religious identification cannot be squeezed into the categories of a sectarian logic that is built into claiming and legally enforcing a right to religious freedom. If you don't know who is religious, how would you know who should be freed? Recent scholarship in religious studies is helpful in this regard. As Salomon and Walton argue:

What makes someone a believer or a member of a faith community and what makes someone not so? What life experiences, confessional commitments, and ritual practices qualify one as an insider, and which prohibit an individual from inclusion? Are 'insider' and 'outsider' categories that we must inhabit permanent[ly] or can we move creatively between them? Most importantly, should scholars [or governments?] attempt to adjudicate these questions of religious identity and belonging, thereby becoming arbiters of orthodoxy (2012: 406)?

Salomon and Walton allude to the complexities of religious affiliation and practice. They acknowledge the difficulties of assigning individuals to the category of believer or non-believer. They allude to the structures of power—the 'arbiters of orthodoxy'—that are involved in deciding who is in and who is out. Official religious freedom advocacy, it seems to me, works in the opposite direction, operating out of a different sensibility. Religious freedom advocates do not question the power of established authorities to make religious designations, but, to the contrary, they look to such authorities to publically adjudicate lines of identity and difference—

along the lines of what Linda Woodhead refers to in this volume as ‘Olympian’ religion. These projects do not seem to question the ability or willingness of everyday people to live according to these religious designations as organised around distinct confessional communities. Instead, they funnel people into one community or the other, fortifying lines of religious difference that otherwise might not be as salient politically, or as divisive socially. So the second paradox of religious freedom promotion is that singling out religion legally and politically from among multiple affiliations held by individuals makes religious difference more politically salient, thereby exacerbating rather than calming social divisions. Advocacy for religious freedom, then, may actually contribute to the violence and discrimination that it purports to cure.

As an example of this politicisation, take the current lawsuit pending against the United States Commission on International Religious Freedom (USCIRF).⁵ This Commission, the bipartisan US government watchdog agency created in 1998 to promote and protect religious freedom abroad, is being sued for religious discrimination in hiring. In 2009, Safiya Ghori-Ahmad, an American lawyer from Arkansas, fluent in Urdu and Hindi, with a Master’s degree in international development, accepted a USCIRF position as a South Asia policy analyst. The Commission hired her to conduct research on South Asia’s human rights and religious freedoms. According to the complaint, four weeks after she had been offered the job, and after she had already left her previous job at the Muslim Public Affairs Council, the offer was rescinded. Instead, she was given a temporary 90-day position that began in late July 2009.

The suit alleges that the Commission withdrew its job offer because Ghori-Ahmad is Muslim. She was told, she says, that the job could not start because of a hiring freeze—but she saw others hired during that same period. Once on the job, according to the suit, her supervisor told her that Commissioner Nina Shea ‘would be upset that USCIRF had hired her because she was Muslim and had been affiliated with a Muslim organisation’, and then ‘suggested ways that Ms. Ghori-Ahmad could limit the negative impression her beliefs and background would create with members of the Commission’. The suit claims that the supervisor recommended that she push back her start date to avoid certain commissioners and ‘call in sick’ on days

when certain commissioners might be in the office, to avoid running into them. This supervisor also allegedly told her to ‘downplay her religious affiliation’, and ‘emphasise that she was a mainstream and moderate Muslim’ who ‘didn’t even cover her hair’. Legal briefs also claim:

Internal USCIRF email and discussions make clear that Ms Ghori-Ahmad’s national origin and religion drove USCIRF’s ultimate decision to rescind its job offer. For example, Shea wrote that hiring a Muslim like Ms Ghori-Ahmad to analyse religious freedom in Pakistan would be like ‘hiring an IRA activist to research the UK twenty years ago’.

In an open letter to the *Washington Post* in June 2012, Ms. Shea claimed that she did not use the words ‘hiring a Muslim’. She countered that:

the first 13 words of this quote—as is clear in the legal complaint—are not mine.... What is especially problematic are the words ‘hiring a Muslim,’ which imply that I am a religious bigot ... I voiced opposition to Ms Ghori-Ahmad because of the bias evident in some of her writings.

Yet such a comment would be consistent with Shea’s record. The suit describes Shea as ‘a long-time vocal critic of Islam as a religion, majority-Muslim countries, and Muslims generally’. She vehemently opposed the Cordoba House/Park 51 project (the so-called ‘Ground Zero Mosque’), as did the USCIRF’s prominent former Commissioner Leonard Leo. A prominent advocate for persecuted Christians, she stated in a 2001 interview, ‘I believe that religious freedom is universal ... but at the same time I find that religious freedom is only fully understood in this country—not even in the west, but in this country.’ Despite such stances, Shea felt it appropriate to ask whether Ghori-Ahmad’s writings and advocacy betrayed a bias.

This is part of a pattern at USCIRF of questioning the motives and patriotism of American Muslims. Most recently, Mitch McConnell appointed M. Zuhdi Jasser as a USCIRF Commissioner. Jasser, a practicing Muslim, is an Arizona cardiologist who founded the American Islamic Forum for Democracy, a conservative lobbying

group that promotes ‘the preservation of the founding principles of the United States Constitution, liberty and freedom, through the separation of mosque and state’. He also served as the narrator in the controversial film, *The Third Jihad*, which alleges a conspiracy of radical Muslims to undermine the United States from within.⁶ Why would an agency dedicated to promoting religious freedom abroad discriminate against religious minorities within the United States?

For Shea and her sympathisers, since religious freedom can only be understood by Americans with ‘mainstream’ beliefs, it can only be extended to ‘mainstream’ religious Americans. Even American Muslims who present themselves as moderates should have their motives questioned and their records examined. According to the suit, Ms. Shea wrote in an email that Ms. Ghori-Ahmad’s profession of tolerance could be dismissed as a sham because it would have been ‘really stupid’ for her to have revealed what Shea believed must be her real views. Islam, in Shea’s mind, equals intolerance, and she was personally committed to exposing this alleged Muslim hypocrisy abroad. This is not religious freedom but a combination of Christian supremacy and flagrant bias against Islam. In this view, ‘religious freedom’ is anything but a pluralist mission to make the world safe for different ways to be religious; it means, rather, a mission to protect American majority religious interests from perceived threats from minority religious traditions.

The Equal Employment Opportunity Commission finished its investigation of Ghori-Ahmad’s case in March 2010, and in May 2010 issued an Acknowledgement and Order according to which both Ghori-Ahmad and USCIRF were allowed to ‘obtain certain discovery from each other’. But, according to the complaint, USCIRF refused to produce documents and denied access to the commissioners involved in rescinding Ghori-Ahmad’s offer for a permanent job. She then requested a hearing before an administrative judge, who dismissed the case. According to the suit, ‘USCIRF—an entity created by Congress to promote religious freedom—argued that it could discriminate against employees without sanction because it was not subject to Title VII of the Civil Rights Act of 1964.’ The judge agreed. But subsequent legal reforms sponsored by Senator Dick Durbin (H.R. 2867) made USCIRF subject to the Civil Rights Act. In June 2012, Ghori-Ahmad filed a lawsuit in the federal district court in Washington, alleging that USCIRF had illegally discriminated in

hiring on the basis of religion. The suit has been wending its way through complex procedural hurdles; at this moment, it appears that the suit will proceed to trial.

Some within USCIRF were appalled by this treatment of Ghori-Ahmad. Bridget Kustin, a former USCIRF researcher, resigned in protest. Knox Thames, the commission's policy and research director, is quoted in the suit as admitting that Ghori-Ahmad's offer had been retracted because 'certain Commissioners objected to her Muslim faith and affiliation.... He said he was sorry this had happened'. Tom Carter, former communications director for the Commission, told *The Daily Beast* that, 'the Durbin reforms give USCIRF a do-over. Hopefully, the new commissioners will take the opportunity to get it right this time.'

But will they? And, more fundamentally, what would it mean to 'get it right'? The USCIRF needs more than an overhaul. Simply broadening the commission's mandate to clarify that it must protect Muslims or other disfavoured minority religions is not sufficient. Government promotion of religious freedom is, by its very nature, a flawed enterprise because the government inevitably becomes involved in deciding which religions, and which forms of which religions, are deserving of protection. Any government position on which religions to protect is necessarily tangled in that government's political commitments, interests and biases. Some will counter that the USCIRF can be fixed by appointing 'better' commissioners. After all, none of the commissioners identified in the lawsuit is still serving. Perhaps future Muslim-American job candidates will not be required to write an essay to prove that they are 'objective and unbiased', as was asked of Ghori-Ahmad. But who will determine who the 'right' person is, politically and religiously? Simply asking the question reveals the project's fatal flaw: no commissioner selected by politicians can possibly stand above religious politics. No governmental officer—no government, period—should be taking on the role of religious arbiter, at home or abroad. A commission that promotes 'religious freedom' may be nearly impossible to oppose—and yet it is an inevitably Orwellian project.

Ghori-Ahmad and USCIRF may reach a settlement. If not, this trial will surely become, as *Christianity Today* describes it, 'one of the most ironic in American history, with the congressional commission

charged with monitoring religious freedom around the world defending its own employment practices in court' (Grant, 2012).

AFTER RELIGIOUS FREEDOM?

The globalisation of religious freedom is not a sign of the victory of rational, peaceful religion over archaic and violent rivals. It is not a sign of the triumph of religion over secularist attempts to run it off the court. There is a more complex story about religious politics to be told about these projects and policies and the bureaucracies conjured up by states and other authorities to implement them. They help to draw lines that publically divide religion from non-religion (increasingly marked as 'culture', as Beaman has argued), differentiate believer from non-believer, and mark off one religious community from the next. Religious freedom advocacy does not merely enforce a universal norm, as liberal internationalists would have it. It helps to *create* individual subjects and 'faith communities' for whom choosing and believing in religion are seen as the defining characteristics of what it is to be a modern religious subject. The right to choose to believe (or not), then, becomes the essence of what it means to be free. To achieve this unity in freedom of belief—belief in belief, as it were—across communities of belief (and non-belief), is what it means to have achieved religious freedom.

This particular model of religious freedom empowers religious authorities in positions of power at the expense of dissenters, doubters and those on the margins of community. It may also undermine democracy.⁷ And this is a third paradox of religious freedom. The promotion of religious freedom may undermine democracy not because democracy is necessarily secular, but because the hierarchical, institutionalised forms of religion defended by the US bishops, the US Department of State, USCIRF Open Doors, the EU, the House Foreign Affairs Committee, Canada's DFAIT, and other advocates for religious liberty regulate—and may even eradicate—the potential for non-established, minority, diverse and democratic forms of religion to flourish.

If the problem that religious freedom is meant to solve is to find ways to live together with multidimensional social diversity and difference, then it may be something that has to occur outside of the spaces enacted through legal regulation by public authorities, religious or secular. Take Foucault's notion of freedom. In this

image, as William Connolly explains, freedom is ‘not reducible to the freedom of subjects; it is at least partly the release of that which does not fit into the moulds of subjectivity and normalisation’. This leads to a ‘conception of rights attached not to the self as subject, but especially to that which is defined by the normalised subject as otherness, as deviating from or falling below or failing to live up to the standards of subjectivity’ (Connolly, 1985: 371). Under Foucault’s agonistic conception of rights, freedom emerges as a transitory site of resistance or mode of insurrection rather than a form of religious or political discipline imposed by the authorities. Rather than something enforced from on high, it is attached precisely to that which the authorities define as other, unorthodox, dissenting, or ‘minoritarian’. An example is the recent campaign by the US Leadership Conference of Women Religious, representing 80 per cent of Catholic nuns in the United States. Women Religious faces disciplinary action by the Vatican, as detailed in the recent ‘Doctrinal Assessment of the Leadership Conference of Women Religious’.⁸ In Elizabeth Castelli’s (2012) reading of this Assessment:

Religious freedom emerges as nothing more than a mode of shoring up the authority of the Magisterium of the Bishops, not a set of values that shelters and protects the acts of conscience undertaken by Catholic women religious in the United States. Yet ironically, recourse to a robust notion of personal conscience is an unambiguously orthodox position in Catholic theology and a fully justifiable exercise of religious freedom on the part of the nuns.

I have suggested in this paper that religious freedom structures the field of religious and political possibility such that individuals are compelled to make political claims on religious grounds; it makes religious difference more politically salient and socially divisive; and it empowers central, often majoritarian, authorities at the expense of dissenters, doubters, minorities, and those living in the shadows or at the margins of established communities. An alternative, agonistic image of freedom, on the other hand, is by definition not something that can be imposed by a state, church or international organisation—or any large, centralised, hierarchical authority. If religious freedom is not something that can be officially promoted, as Sullivan’s (2012) ‘impossibility’ argument persuasively argues,⁹ then,

we could ask, what are all of these centralised, hierarchical religious and political authorities promoting? In whose name do they speak? Are those empowered by the rise of religious freedom capable of assessing and judging the lives of those they seek to redeem?¹⁰ And if not, who will speak for the other ways of being religious, and being human, that are casualties of the relentless, and at times reckless, drive to globalise religious freedom which is, after all, only one mode of living with religious diversity among others.



NOTES

1. These possibilities are explored in a recent series of posts, 'The Politics of Religious Freedom', on *The Immanent Frame* (TIF), the Social Science Research Council's online discussion forum on religion and the public sphere: <http://blogs.ssrc.org/tif/the-politics-of-religious-freedom/>. The series addresses the multiple histories and genealogies of religious freedom and the many contexts in which these histories and genealogies are salient today. It is part of a joint research project, 'The Politics of Religious Freedom: Contested Norms and Local Practices': <http://iiss.berkeley.edu/politics-of-religious-freedom/>
2. This section expands upon my post, 'Believing in Religious Freedom', *The Immanent Frame*, 1 March 2012, <http://bit.ly/wqmRWT>
3. Quoted in Dorell and Lynch (2012).
4. Hiltermann (2012) observes that 'Sunni-Shia interaction is what defines daily life at the workplace and in many neighborhoods'.
5. See Hurd (2013).
6. See <http://therevealer.org/archives/10349>
7. See Sullivan (2012).
8. See the Vatican Congregation for the Doctrine of Faith's 2012 report for more.
9. See Sullivan (2007) for more on this argument.
10. See Abu-Lughod (2011: 255).

REFERENCES

- Abu-Lughod, Lila. 2011. 'Anthropology in the Territory of Rights, Islamic, Human, and Otherwise...', in Ron Johnston (ed.), *Proceedings of the British Academy*, Vol. 167, 200. Lectures. Oxford: Oxford University Press.
- . 2010. 'Against Universals: The Dialects of (Women's) Human Rights and Human Capabilities', in J. Michelle Molina and Donald K. Swearer (eds.), *Rethinking the Human*. Cambridge: Harvard University Press.
- Beaman, Lori G. and Winnifred F. Sullivan (eds). 2013. *Varieties of Religious Establishment*. London: Ashgate.

- Castelli, Elizabeth A. 2012. 'The Bishops, the Sisters, and Religious Freedom', *The Immanent Frame*, 16 May, [tp://blogs.ssrc.org/tif/2012/05/16/the-bishops-the-sisters-and-religious-freedom/](http://blogs.ssrc.org/tif/2012/05/16/the-bishops-the-sisters-and-religious-freedom/)
- . 2007. 'Theologizing Human Rights: Christian Activism and the Limits of Religious Freedom', in Michel Feher, Gaëlle Krikorian and Yates McKee (eds.), *Non-Governmental Politics*. New York: Zone Books.
- Connolly, William E. 1985. 'Taylor, Foucault, and Otherness', *Political Theory*, Vol. 13 (3), pp. 365–76.
- Dorell, Oren and Sarah Lynch. 2012. 'Christians Fear Losing Freedoms in Arab Spring Movement', *USA Today*, 31 January, <http://usatoday30.usatoday.com/news/religion/story/2012-01-30/arab-spring-christians/52894182/1>
- Grant, Tobin. 2012. 'The Story Behind One of the Most Ironic Religious Freedom Lawsuits Ever Filed', *Christianity Today*, 26 September, <http://www.ctlibrary.com/ct/2012/september-web-only/most-ironic-religious-freedom-lawsuit.html>
- Hiltermann, Joost. 2012. 'Bahrain: A New Sectarian Conflict?', *The New York Review of Books Blog*, 8 May, <http://www.nybooks.com/blogs/nyrblog/2012/may/08/bahrain-new-sectarian-conflict/>
- Hurd, Elizabeth Shakman. 2013. 'Muslims Need not Apply', *The Boston Review*, 24 January.
- . 2012. 'Believing in Religious Freedom', *The Immanent Frame*, 1 March, <http://bit.ly/wqmRWT>
- Mekhennet, Souad. 2011. 'Moderate Islamist Party Winning Morocco Election', *The New York Times*, 26 November.
- Salomon, Noah and Jeremy F. Walton. 2012. 'Religious Criticism, Secular Criticism, and the "Critical Study of Religion": Lessons from the Study of Islam', in Robert A. Orsi (ed.), *The Cambridge Companion to Religious Studies*. Cambridge: Cambridge University Press.
- Sullivan, Winnifred F. 2012. 'The World that Smith made', *The Immanent Frame*, 7 March 7, <http://blogs.ssrc.org/tif/2012/03/07/the-world-that-smith-made/>
- . 2007. *The Impossibility of Religious Freedom*. Princeton: Princeton University Press.
- Vatican Congregation for the Doctrine of the Faith. 2012. 'Doctrinal Assessment of the Leadership Conference of Women Religious', *United States Conference of Catholic Bishops*, 18 April, <http://www.usccb.org/loader.cfm?csModule=security/getfile&pageid=55544>

