

CHRISTIANITY, HOMOSEXUAL BEHAVIOR, AND SEXISM

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Almost without exception, those in the West who think that homosexual behavior is morally wrong are Christians (the belief that all homosexual behavior is wrong is also common among the devotees of other Abrahamic religions, e.g. Islam, and perhaps among other cultural groups elsewhere in the world). But is it true that, assuming a traditional Christian worldview, there are strong reasons to think that *all* homosexual behavior is morally wrong? Traditionally, Christians have appealed to three independent sources to justify any given belief: church tradition, scripture, and reason. If a Christian is justified in believing that homosexual behavior is morally wrong, his reasons must appeal one of these three sources. As it turns out, however, this is a difficult trick to turn. None of these sources provides a clear reason to think that homosexual behavior is morally wrong, and at least one of them provides a clear reason for thinking that, in at least some cases, it is morally permissible.

Before exploring the issue in detail, there is a methodological point to be raised only to be set aside. What is the Christian to do when one or more of these three sources disagree? For example, suppose that the Bible says one thing, but then reason says something else? Or suppose the Bible says one thing and church tradition says quite the opposite? This is an instance of a more general epistemic problem. For example, what is the reasonable thing to do when our visual evidence conflicts with our memorial evidence? In the case of the Christian, the quandary can be solved in a number of different ways. One suggestion that has historically held weight in the Christian church is that reason 'trumps' both scripture and tradition. The general

defense of this solution is as follows: we only believe that the Bible (as opposed to the *Qur'an*) is legitimately from God or that the Christian church (as opposed to the Mormon Church) is guided by God by using our minds. Thus, reason is epistemically basic or prior to scripture or church tradition. It is this 'reason first' solution that is employed when someone rejects the claim that the world was created in six 24-hour days in light of contemporary scientific findings.

A second solution is to insist that church tradition trumps both reason and the Bible. The defense here is similar: the Bible is a collection of books put together by church tradition, so we have to rely first on God's role in guiding the church before we have any reason to think that the Bible is actually communication from God.

And the third solution is also familiar: the Bible trumps both reason and church tradition. Perhaps the best defense of this solution is to insist that church tradition 'grew out of' God's communication to us via the Bible and that our faculty of reason is defective and thus not trustworthy to adjudicate intellectual disputes. Hence it is the Bible that is epistemically prior and should be trusted when conflicts arise among the three sources of knowledge.

As important as this dispute is, we need not solve it for our purposes here. The case for the universal moral wrongness of homosexual behavior is lopsided enough that serious issues of 'trumping' never arise. However, it's worth mentioning this dilemma for the following reason: even if one disagrees with the evaluation provided below and decides, for example, that the Bible provides a powerful reason for thinking that all homosexual behavior is morally wrong, this alone will not settle the debate over what a Christian should believe, *all things considered*. That's because on some of the solutions above, what the Bible says will ultimately be 'trumped' by other sources of information. So whether or not this is the end of the story depends on which solution mentioned above is correct.

Appeal to church tradition

We start with a look at what provides the strongest (although still weak) case for the claim that all homosexual behavior is morally wrong: church tradition. As it turns out, early Christians were mostly ambivalent about homosexual behavior. Many did not understand scripture as forbidding such activity (see below). Furthermore, homosexual unions were both legal and ubiquitous in the Greek and Roman worlds. In fact, it is plausible that some early Christian leaders were involved in erotic relationships with other men (e.g. Ausonius and St. Paulinus, Bishop of Nola) (See Boswell 1980, 1994).

However, beginning most clearly with Clement of Alexandria in the second century and St. Augustine in the fourth century, church fathers began to claim that all homosexual behavior is morally wrong. The list of church leaders defending this position is long, including early figures like Jerome and Chrysostom and later figures like Albertus Magnus and St. Thomas Aquinas. Interestingly, the justification for this prohibition varied widely among early church leaders – while they agreed *that* it was wrong, they disagreed about *why* it was wrong. Some decried homosexual behavior because it often involved pedophilia, prostitution, pagan rituals or incest. Others took the misogynistic line that the problem was that the man allowed his body to be used as the body of a woman. Another complaint was that homosexual behavior was ‘unnatural.’ Finally, others criticized not only homosexual behavior but a host of sexual activities like oral sex on the basis of the so-called Alexandrian rule: the only licit sexual activity is that which is ‘directed toward’ reproduction (See Jordan 1997, Brown 1988).

Contemporary church tradition continues this theme. For example, the official position of the Roman Catholic Church is that all homosexual behavior is morally wrong, and many Protestant and Orthodox sects agree. Thus, one reason for a Christian to think that all homosexual behavior is morally

wrong is an appeal to this tradition. Assuming that God works through his church and is guiding its leaders, it is natural to assume that the consistency of official church doctrine over the generations is a reason to believe that the doctrine is true.

However, before moving on, note that such an appeal is of limited value. First, while it may be the official view of the church leaders, this is not to say that it is the view of the majority of practicing Christians. For example, it is the official view of the Roman Catholic Church that the use of contraception is morally wrong, but surveys consistently show that an overwhelming majority of Roman Catholics disagree. Second, the church has historically made fantastic errors on moral matters, including everything from the moral status of masturbation and women to the legitimate use of force against others (e.g. the Inquisition). Thus, at best the appeal to church tradition is a mild and defeasible reason to think that all homosexual behavior is morally wrong.

Appeal to the Bible

Putting appeals to tradition aside, the most common contemporary Christian justification for the belief that all homosexual behavior is morally wrong is an appeal to the Bible. While it would take the careful work of a Biblical scholar and theologian to produce a thorough analysis of the issue, careful reading and a little common sense is sufficient to demonstrate the following modest claim: scripture does not *obviously* show that all homosexual behavior is morally wrong. If there is a good argument from scripture, it will require quite a bit of work on the part of the exegete. However, before looking at particular verses, it is important to note a couple of initial worries.

First, the issue under consideration is about *moral wrongness*. However, when one reads the Bible, notice how infrequently one finds the word 'wrong' (and one never finds the

word 'moral' – at least not in the version on my desk). The Bible talks about abominations, sins, indecency, etc. For example, one of the common citations concerning homosexual behavior reads as follows:

You shall not lie with a male as one lies with a female; it is an abomination. (Leviticus 18:22)

The problem is that it is not at all obvious that the concept of an abomination is identical to the concept of moral wrongness. In fact, it seems quite obvious that it is not, for there are many things the Bible declares to be abominations that are clearly not morally wrong (e.g. sexual activity with a menstruating woman). Perhaps the best that can be said is this: in some places scripture appears to *prohibit* at least some kinds of homosexual behavior. But notice that things can be prohibited for many reasons: they could be unsafe, unclean, irreligious, illegal, etc. Perhaps this verse is describing a behavior that would render an ancient Jew ritually unclean or something of that sort. Thus, even if it's true that the Bible claims that all homosexual behavior is a *sin* or that all homosexual behavior is an *abomination*, this is not tantamount to claiming that all homosexual behavior is *morally wrong*.

Second, even if we decide that the Bible employs the concept of moral wrongness, there is a second problem. It is not obvious that every mention of homosexuality in the Bible refers to *every* instance of homosexual behavior. Some scholars suggest that the Biblical authors were actually referring to male prostitution, homosexual temple sex, etc. (For example, Helminiak 2000).

Setting these issues aside, the relevant verses of the Bible cited to show that all homosexual behavior is morally wrong are ambiguous at best. Here they are in textual order:

Sodom and Gomorrah (Genesis 18:20–19:29): The story of Sodom and Gomorrah is often cited as a reason to think that all homosexual behavior is morally wrong. The thought

is that since the men of the town ask Lot to bring the two visiting angels out 'so that they may have relations with them' and that God later destroys the city, this must be an implicit way of saying that all homosexual behavior is morally wrong. However, this interpretation is strained for multiple reasons. First, God tells Abraham that he is going to destroy the wicked city *before* the angels visit (18:20). So it doesn't appear that God punishes the city as a result of what the men do (or attempt to do) to the visiting angels.

Second, even if we agree that God destroys the city for what the men attempt to do to the angels, it's not obvious that it's the *homosexual* nature of the behavior that prompts this retribution. To see this, suppose that the visiting angels in the story had been female. Would anyone have taken the story to show that all heterosexual sex was morally wrong? Of course not – that's absurd. But then, so, too ought we to refrain from concluding that the point of the story is that all homosexual behavior is wrong.

Thirdly, the Bible explicitly notes why Sodom and Gomorrah was destroyed, and it has nothing to do with homosexual behavior:

Behold, this was the guilt of your sister Sodom: she and her daughters had arrogance, abundant food, and careless ease, but she did not help the poor and needy. (Ezekiel 16:49)

As it turns out, the sin of Sodom appears to be some sort of social injustice, not engaging in homosexual behavior. This is the interpretation of the story that was accepted by many of the early church fathers as well, notably Origen and John Cassian (Boswell 1980). So the story of Sodom and Gomorrah provides little reason to think that all homosexual sex is morally wrong.¹

Old Testament commandments (Leviticus 18:22, 20:13): The law handed down by Moses to the people of Israel as recorded in Leviticus contains several prohibitions on homosexual behavior. The basic problem with appealing to

these verses to show that all homosexual behavior is morally wrong is obvious: the Old Testament law prohibits a great many things, most of which we don't think are morally wrong. For example, the verses surrounding these two claims about homosexual behavior also require us to stone those caught in homosexual acts (20:13) and to refrain from cutting our beards or getting tattoos (19:27–28). So if we accept these Old Testament prohibitions as evidence that all homosexual behavior is morally wrong, on pain of inconsistency we must also accept similar prohibitions as evidence that it's wrong to shave. Now it's open to someone to argue both that some subset of OT commands are still applicable *and* that (conveniently) the commands regarding homosexuality are in this subset, but it's hard to see how to defend this pair of claims.

Romans on degrading passions (Romans 1:22–27): The first chapter of Romans contains an extended diatribe against men who have 'suppressed the truth' of God in favor of idols and explains in detail what has become of them:

For this reason, God gave them over to degrading passions; for their women exchanged the natural function for that which is unnatural, and in the same way also the men abandoned the natural function of the woman and burned in their desire toward one another, men with men committing indecent acts and receiving in their own persons the due penalty of error. (Romans 1:26–7)

There are so many questions about this passage that it's hard to know where to start. On its face, it appears to report that there was a group of people who failed to acknowledge God's existence, and as a result they were allowed to experience certain degrading emotions. It certainly does not say that all homosexual behavior is morally wrong (strictly speaking, it doesn't say that *anything* is morally wrong). And while it does refer to men committing

indecent acts with one another, certainly this alone wouldn't show that *all* homosexual conduct is morally wrong – we can all grant that it is possible for men to commit indecent acts with women but yet not accept that all heterosexual conduct is morally wrong. Finally, it's not clear that 'indecent' means 'wrong'. Lots of activities are indecent but not morally wrong (e.g. showing up nude at a public beach).

New Testament lists (I Corinthians 6:9–10; I Timothy 1:8–11): Finally, there are two lists in the New Testament that are often raised as providing evidence that the Bible claims that all homosexual behavior is morally wrong. I Corinthians contains a list of characters, we are told, who will not inherit the kingdom of God.² The list includes homosexuals. I Timothy contains a list of characters, we are told, for whom the law was made.³ The list includes homosexuals. In each case, homosexuals are listed among a variety of seedy characters ranging from murderers and kidnapers to the effeminate and party-goers.

These lists may provide the best Biblical evidence for the claim that all homosexual behavior is morally wrong. But if this is the best, it is weak indeed. First, scholars disagree about whether it is accurate to translate the relevant Greek word as 'homosexuals'. Furthermore, the dominant church tradition has understood this verse to condemn masturbation, not homosexual behavior (Boswell 1980, 1994). Second, it appears that it doesn't seem that all of the character traits presented in these lists are morally bad. Is it really morally wrong to act effeminately? Finally, even if we agree that these lists are designed to show that *some* instances of homosexual behavior are morally wrong, it's not clear that they are meant to include *all* forms of homosexuality or simply forms of homosexuality which the authors thought troublesome: sex with prostitutes, adulterous homosexual sex, etc.

Now perhaps conservative Biblical scholars have cooked up various explanations that deal with the problems raised above and show that, in the final analysis, we should

believe that the Bible teaches that all homosexual activity is morally wrong. But that is consistent with the point made here: the Bible doesn't *obviously* indicate that all homosexual behavior is morally wrong. And in the absence of a convincing case to the contrary, we should believe what is most obvious. Furthermore, such a story seems problematic for other reasons. Are we to conclude that God wasn't bright enough to craft a book to say clearly what he wanted to say? If deciphering the message about the moral permissibility of homosexual activity takes 6–10 years and a PhD, one might think that this alone is good reason to think that either the Bible is not from God or else that this message is not what God intended. All things considered, the Bible provides a very weak reason to think that all homosexual activity is morally wrong.

Appeal to reason

When a non-empirical claim cannot be justified by appeal to either church tradition or Scripture, the Christian has one last option: it might be defensible by appeal to reason. This is the practice of doing philosophy. And there is a good reason to think both that at least *some* homosexual behavior is morally permissible and furthermore that the relevant challenges to this argument fail.

So what is this powerful reason for thinking that at least some homosexual behavior is morally permissible? The reason is this: a person's gender is not, *per se*, a morally relevant feature of any action, and in at least some cases, the only difference between a permissible act of heterosexual sex and an act of homosexual sex is the gender of the actor. So, we ought to conclude that in at least some cases, homosexual sex is morally permissible.

Many of us think that it is wrong to treat someone differently *solely* on the basis of that person's gender. If a law allows men to vote but prohibits women from voting, this is

unfair; it is sexist. In moral terms, we might state the view as follows:

Sexism: the actor's gender is a morally relevant feature of an action.

A sexist thinks that in at least some cases a person's gender *alone* justifies us in treating that person differently from others or shows that an action is permissible for an actor of one gender but wrong for an actor of a different gender.

Is sexism true? Many of us have two reasons to deny it. First, for many of us, the view is counterintuitive. We simply find ourselves believing that some things matter morally (e.g. the fact that an action causes pain) and others do not (e.g. the color of the actor's shirt). Second, there is a good inductive argument for the falsity of sexism. Does one's gender *by itself* make a moral difference in various cases that you can think of? Does gender make a difference in cases of murder, lying, theft, adultery, etc.? No. Hence we have reason for thinking that sexism is false.

Suppose you think that sexism is false. That is to say, you think that if two actions are alike in every respect except gender, then the one will be morally permissible if and only if the second is permissible as well. Gender, in other words, doesn't make a moral difference. Given that sexism is false, then any act of homosexual sex that is relevantly like a morally permissible instance of heterosexual sex will itself be morally permissible. So imagine a case of heterosexual sex that you think is morally permissible (e.g. one that occurs within a stable, committed relationship, etc.). Now make only one change to this hypothetical situation: change the gender of one of the partners. If sexism is false and if the initial sexual act was morally permissible, then, so, too, is the latter instance. Thus at least some homosexual behavior is morally permissible.

To challenge this line of thinking, we need to identify a morally relevant difference between all homosexual behavior

and all heterosexual behavior. If we can do so, then the argument from sexism fails. But let's be clear what we're looking for. Obviously *some* sexual actions are morally permissible. If homosexual actions are morally wrong, then there must be some *essential* feature of homosexual actions that is morally *relevant* that could explain the difference between the rightness of heterosexual sex and the wrongness of homosexual sex. Thus we are looking for some feature of homosexual sex that is both *essential* and morally *relevant*.

To be *essential*, the feature must be such that all instances of homosexual sex have that feature. Recall that the claim under dispute is whether or not *some* homosexual behavior is morally permissible (everyone should agree that not acts of homosexual behavior are permissible, e.g. homosexual rape). Those who deny this claim are committed to the following: *all* homosexual behavior is morally wrong. To make the case for the 'all' portion of this claim, we need to identify a feature that *all* instances of homosexual behavior share. If we find a feature that only *most* instances share, then the best that we can show is that *most* homosexual behavior is wrong. This is why the feature must be essential. Making this kind of mistake is quite common. For example, one might argue that homosexual sex is morally wrong because it takes place between people who are not committed to one another's long-term welfare, etc. But notice that even if many (or even most) instances of homosexual behavior share this feature, it is certainly not essential since some instances of homosexual sex take place between people who *are* committed to one another's long-term welfare, etc. Furthermore, if it were the insufficient commitment between the partners that makes the action wrong, then notice that much of the heterosexual behavior that occurs would be wrong for the same reason. After all, it's quite obvious that a lot of heterosexual sex occurs between partners that are not committed to one another's long-term welfare, etc. Thus there would be nothing *uniquely* wrong with homosexual sex.

To be morally *relevant*, a feature has to be the kind of thing that makes a difference to the moral status of an action. For example, the color of one's skin – much like the color of one's shirt – is not a morally relevant feature of an action. If you're trying to figure out whether or not it was morally wrong for me to take the candy bar, one question you're not going to ask is whether my shirt was blue. Instead, you'll ask about whether I owned the candy bar, had permission to take the candy bar, harmed anyone by taking the candy bar, benefited anyone by taking the candy bar, etc. In other words, you'll ask about features of the action that are morally relevant.

Now that we have a handle on what it means for a feature to be both essential and morally relevant, are there any features of homosexual behavior that meet both conditions? It's hard to see what it might be. Certainly one essential feature of all homosexual actions is that they occur between members of the same sex. But as we noted above, gender is *not* morally relevant. So to insist that one class of sexual action is wrong while a class relevantly similar with the exception of gender is wrong is to think that gender is morally relevant. It is to be sexist.

That is, it is sexist with one exception. Consider the following case. Jones, a man, is put on the stand to testify. He promises to tell the whole truth and nothing but the truth. The attorney conducting the cross examination asks Jones the following question: 'Are you a man?' Consider the following action type: answering the question in the affirmative. In this carefully constructed case, it would morally permissible for a man to answer the question in the affirmative but morally wrong for a woman to answer the question in the affirmative. So it at least appears that gender *can* sometimes make a difference in the moral status of the action. Perhaps sexism is true after all.

But this appearance dissipates once we realize what really drives the moral explanation. In this case, the reason that it would be wrong for a woman to answer the question in the affirmative is not that she is a woman but that she

would be perjuring herself by lying. But since the case was constructed around gender, the moral status of the action varies with the gender of the actor. Such features are called co-extensional features – they come and go together. Whenever one of the properties is found, the other is found as well. For example, the property of being a renate (having a kidney) is co-extensional with the property of being a chordate (having a spinal cord). All beings with kidneys have spinal cords and vice versa. In the courtroom case, the gender of the actor is co-extensional with the wrongness of the action – anytime the answer was a lie, it was given by a woman and vice versa.

But it's *not* the gender of the actor that really makes the moral difference – it's whether or not the actor is lying that makes the moral difference. Thus, lying is also co-extensional with the wrongness of the action. And since gender determines whether or not the actor is lying, it is *indirectly* co-extensional with the wrongness of the action. And thus sexism is false after all since it is not the *gender* that makes the moral difference – it is something that gender is co-extensional with that makes the difference.

This same strategy is open to someone who thinks that homosexual sex is morally wrong. It's not the gender of the actor *all by itself* that makes the action morally wrong but some morally relevant feature that is essentially tied to the gender of the actor in such cases that makes a moral difference. But the burden of proof has now shifted: what feature is it that both matters morally and is so closely tied to gender that it is present in all and only cases of homosexual sex? Here are some standard candidates:

Homosexual sex is revolting or repugnant. Some have suggested that what's wrong with homosexual sex is that it is repugnant. Thus it's not the gender of the actor that makes a moral difference but the fact that all homosexual sex is repugnant that makes a moral difference. How does this response fare? First, it's not clear what it means to be repugnant. If that means something like 'morally corrupt,' then this analysis of the issue begs the question. It says

that what makes homosexual sex morally bad is that it's morally bad. If 'repugnant' means something like disgusting, then it's clearly morally irrelevant. There are plenty of actions that are super-disgusting despite the fact that they're not wrong to engage in (e.g. eating maggots). Also for many of us, on this understanding of 'repugnant' lots of heterosexual sex would cross the line as well – think of weird sexual positions, etc. So this feature seems both morally irrelevant and something that would include instances of non-homosexual sex.

Homosexual sex is non-reproductive. One traditional complaint about homosexual sex is that it is non-reproductive. Thus, again, it's not the gender of the actor alone that makes a moral difference but the fact that all homosexual sex is non-reproductive. I think it's safe to agree that (without some radical breakthroughs in technology), all homosexual sex is non-reproductive. So this property is clearly essential. But is it morally relevant? Again, it seems that this feature does not make a difference in a wide range of other cases. For example, oral sex is essentially non-reproductive, but surely some cases of oral sex are morally permissible. Similarly, heterosexual sex involving contraception, sex between partners past child-bearing age, etc. are all non-reproductive and yet permissible in at least some cases. So it can't be the non-reproductivity of homosexual sex that makes it wrong.

Homosexual sex is unnatural. As noted in the section on church tradition, a common complaint about homosexual sex is that it is unnatural. Thus, it's not the gender of the actor alone that makes a moral difference but the fact that all homosexual sex is unnatural. It's tough to assess this claim without having a clear idea of what it means for an action to be natural. On one reading of the term, an action is natural if tokens of that type occur in the natural world. But in this sense of 'natural', homosexual sex is quite natural indeed. Not only has homosexual sex been present throughout recorded history in humankind, it is also quite prevalent among non-human animals.

On a second reading of the term 'natural', an action is natural just in case it uses objects in ways that they were not designed to be used. For example, it is unnatural in this sense to use a telephone as a hammer. Is homosexual sex unnatural in this second sense? Perhaps. On plausible readings of evolutionary history, sexual organs were selected for or 'designed' for the goal of reproduction. Thus using one's sexual organs for something other than reproduction is unnatural in this sense. However, it seems that a great many sexual actions are unnatural in this sense as well, including any non-reproductive sex (e.g. masturbation, oral sex, anal sex, etc.). As a matter of fact, since on the Darwinian picture all of our body parts were selected for ultimately on the basis of survival value (i.e. reproductive value), it seems that almost everything we do is unnatural in this sense, including painting pictures, doing ballet, and reading this article!

Third, and finally, some people seem to mean by 'natural' commanded by God (though Natural Law theorists in philosophy won't make this confusion). An action is natural in this sense just in case it is an action that is permitted by the commands of God. On this reading, whether homosexual sex is morally wrong depends on whether or not God exists and has prohibited such actions by his commands. This option suffers two faults. First, from a Christian perspective, it's not at all obvious that God has declared all homosexual activity morally wrong (see above). Second, this option requires the truth of a normative view in ethics called divine command theory. According to divine command theory, what makes rape morally wrong is that God forbade it (and nothing more). So if one finds divine command theory implausible, one will also find this reading of 'natural' implausible.

It's hard to think of other candidate properties that are co-extensional with an agent's gender in an instance of sexual behavior. A tentative conclusion is as follows: if you think that all homosexual sex is morally wrong but deny that all heterosexual sex is wrong, then in order to avoid being sexist, you must determine the morally relevant

difference between heterosexual sex and homosexual sex. In the absence of reasons to think that there is a morally relevant difference, anyone who rejects sexism should endorse the argument offered at the outset of this section.

Thus there is a powerful argument from reason for the moral permissibility of at least some homosexual acts. Given that the evidence from the Bible is ambiguous at best and that church history provides only a weak reason for thinking that all homosexual behavior is morally wrong, the fact that there is a powerful argument from reason alone for its permissibility provides Christians with a good all-things-considered reason for thinking that at least some homosexual behavior is morally permissible.

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Notes

¹ The story of the Levite and his concubine (Judges 19) has a similar story of men insisting that strangers be brought to them for homosexual sex, but that story is even less plausibly a reason to think that all homosexual behavior is morally wrong. II Peter 2:6–10 and Jude 7 both mention Sodom's 'gross immorality' and the 'sensual conduct of unprincipled men' but this tells us nothing beyond what the original story conveys – obviously some of the men of the city were unprincipled and engaged in gross, sensual immorality! The question is whether it's the homosexual nature of their activity or the lack of consent that is being condemned.

² 'Or do you not know that the unrighteous shall not inherit the kingdom of God? Do not be deceived; neither fornicators, nor idolaters, nor adulterers, nor the effeminate, *nor homosexuals*, nor thieves, nor the covetous, nor drunkards, nor revilers,

nor swindlers, shall inherit the kingdom of God.' (I Corinthians 6:9–10, emphasis mine).

³ 'But we know that the law is good, if one uses it lawfully, realizing the fact that the law is not made for a righteous man, but for those who are lawless and rebellious, for the ungodly and sinners, for the unholy and profane, for those who kill their fathers and mothers, for murderers and immoral men *and homosexuals* and kidnapers and liars and perjurers, and whatever else is contrary to sound teaching, according to the glorious gospel of the blessed God, with which I have been entrusted.' (I Timothy 1:8–11, emphasis mine).

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