



Rebels Without a Clause:

When Senators Run Roughshod Over the “No Religious Test” Clause of the U.S. Constitution

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Introduction

When President Donald Trump announced his nomination of Judge Amy Coney Barrett to the Supreme Court, critics were quick to point not to this qualified nominee’s record, but rather to her religious affiliations as a reason she ought not be allowed to serve as a Supreme Court justice. News and opinion pieces claimed people like this successful and accomplished jurist inspired a patriarchal dystopian fantasy portrayed in the book, *The Handmaid’s Tale*,¹ and commentators cited Barrett’s informal affiliation with a prayer group as cause for concern.² In an increasingly secular culture, it is not only the media that views faith as problematic for those appointed to judicial positions. Senators, particularly Democrats, have inappropriately interrogated nominees with comments and lines of questioning spanning theology, congregation membership, and associations with faith-based nonprofits, all seemingly with the intent to discredit the nominees.

Judge Amy Coney Barrett has already served as a prominent, modern example of the use of religious tests for public office. During Judge Barrett’s 2017 confirmation hearing for the U.S. Court of Appeals for the Seventh Circuit, Senator Dianne Feinstein (D-Calif.) interrogated Barrett, who is Catholic: “the conclusion one draws is that the dogma lives loudly within you. And that’s of concern . . .”³ Judge Barrett responded with dignity, saying, “I see no conflict between having a sincerely held faith and duties as a judge.”⁴

The debate over religious tests is likely to be at the forefront of Judge Barrett’s Supreme Court confirmation process. When Senator Mazie Hirono (D-Hawaii) (who has previously referred to a resolution disapproving of religious tests as “alt-right” when speaking on the Senate floor⁵) was recently asked by a reporter whether Barrett’s religious beliefs should be off-limits during the upcoming confirmation process, she responded: “No.”⁶ Democratic Speaker of the House Nancy Pelosi (D-Calif.) refused to directly address the question when asked if Barrett’s religious beliefs should be off-limits.⁷ Yet Senate Majority Leader Mitch McConnell (R-Ky.) has made his position clear, condemning such religious tests and referencing Barrett’s 2017 confirmation battle when speaking from the Senate floor last year.⁸ More recently, Senator Josh Hawley (R-Mo.) warned Senate Minority Leader Chuck Schumer (D-N.Y.) to steer clear of attacks on Barrett’s religion in the upcoming confirmation process,⁹ and Senate Judiciary Committee Chairman Lindsey Graham (R-S.C.) warned he’s ready for a “fight” if Barrett is attacked for her faith.¹⁰ As the battle ramps up over President Trump’s latest Supreme Court pick, we must remember that no religious test should be used to disqualify the nominee.

The “No Religious Test” Clause: Overview and Analysis

Known as the “No Religious Test Clause,” Article 6, Clause 3, of the U.S. Constitution states that “no religious Test shall ever be required as a Qualification to any Office or public Trust under the United States.”¹¹

Commentators correctly point out that questions about religious beliefs and views posed to nominees for public service violate the spirit – if not the terms – of this provision of the Constitution.¹²

As Senator Chuck Grassley (R-Iowa) said while serving as chairman for the Senate Judiciary Committee, “one of the most important founding principles” is that one should be deemed qualified based on their demonstrated ability rather than their religious affiliations.¹³ Disturbingly, senators have seen fit to buck this principle.

Aside from the questions posed to Amy Coney Barrett, other recent confirmation hearings have featured a troubling pattern of questions posed to presidential nominees by senators, revealing a hostility toward religion and people of faith. For example, because in his view “religion [has been] used as a ruse to discriminate,” Senator Cory Booker (D-N.J.) thought it was appropriate to ask a judicial nominee during her confirmation hearing whether she thought same-sex relationships were a “sin.”¹⁴ Senator Bernie Sanders (I-Vt.) said that Russell Vought, nominated as Deputy Director of the Office of Management and Budget, was “really not someone who is what this country is supposed to be about” because of the nominee’s expression of his Christian beliefs in the context of a theological discussion.¹⁵

As the reader will see below, sadly, these are not the only such interrogations that have taken place in the Senate in recent years. The questioning has primarily been led by Democratic senators, and the nominees are mostly up for judicial office.

As we undertake to assess whether a religious test has occurred under Article VI of the Constitution, it is important to distinguish what questions should generally be considered appropriate or inappropriate. For instance, “[m]erely asking a nominee whether their beliefs might stop them from fulfilling their Constitutional duties is a relevant question.”¹⁶ But “[r]ejecting someone over their faith alone is unquestionably a religious test.”¹⁷ A senator should not deem a nominee “fit or unfit according to his or her formal affiliation with one religious group or another.”¹⁸ And as Senator Mike Lee (R-Utah) explained, “asking [a] nominee about the particulars of his or her religious beliefs” is inappropriate because it will “inevitably expose those beliefs as somehow a qualifier or a disqualifier for public office.”¹⁹

Yet examining the incidents below, on balance senators have frequently posed probing questions to nominees structured in such a way that a nominee’s affirmation of her beliefs or the role of religion in her life would cast her as discriminatory and unqualified for service.

The problem with such questioning is that regardless of the political party of the senator, the nominee’s religious beliefs, or the particular office, these questions deter qualified candidates from pursuing public office at all. They imply that an otherwise qualified nominee should be disqualified simply because of her religious beliefs or affiliation.

A person’s faith informs every aspect of her life, and the career of a nominee of faith is no exception. Faith and religion are often the foundation for characteristics like integrity and honesty, which are qualities we want in candidates for public office. But the questions posed imply that faith and religion

are incompatible with public service. This thinking threatens to create a deficit of true leaders who are often such great role models *because* of their faith.

Following is a list of documented incidents (starting with the most recent) in which nominees have faced inappropriate questions from senators aimed at discrediting the nominee based on their religious beliefs or affiliation.

Documented Incidents of Senators Using Religious Tests for Public Office

February 2019 - Administrator of the Office of Information and Regulatory Affairs Neomi Rao²⁰ was asked by Senator Cory Booker, “Do you believe [same-sex relationships are] a sin?” Senator Booker suggested this was an appropriate line of questioning because “religion [has been] used as a ruse to discriminate against African Americans.”

January 2019 - William Barr²¹ was questioned by Senator Sheldon Whitehouse (D-R.I.) about a 1992 speech, and Senator Whitehouse quoted reports that said Barr “blamed secularism for virtually every contemporary societal problem.” Relying on this characterization, Senator Whitehouse asked, “About a quarter of American adults today are not religious. Do you still think that those Americans are responsible for virtually every contemporary societal problem? If not, what changed your mind?” Senator Whitehouse concluded, stating, “Given your stated views on the evils of secularism, what commitments will you make to ensure that non-religious career attorneys and staff at the Department are protected against disparate treatment on the basis of their secularism?”

November/December 2018 - Paul Matey and Judge Brian Buescher²² received questions about their membership with the Knights of Columbus, a “Catholic fraternal benefit society” that provides extensive charitable services.²³ Senator Kamala Harris (D-Calif.) questioned both nominees about whether they agreed with the organization’s traditionally held views on the sanctity of marriage and life. Senator Mazie Hirono (D-Hawaii) cast the organization as having “taken a number of extreme positions.” Senator Hirono also asked if, given the nominees’ membership, they would “deal with reproductive rights and abortion issues fairly and impartially.” She questioned whether Judge Buescher and Matey would end their memberships with it “to avoid any appearance of bias.” In addition, Senator Hirono asked Judge Buescher and Matey whether they “believe[d] federal funds should not be given to [those] providers who support abortion services.” Senator Hirono also asked each nominee about the health value of contraceptives and “what steps” each took “to make clear that [they did] not hold [those] views” reflected in statements by the Knights of Columbus.

October 2018 - Allison Rushing²⁴ received questions from Senators Feinstein, Patrick Leahy (D-Vt.), Whitehouse, Chris Coons (D-Del.), Richard Blumenthal (D-Conn.), Hirono, Booker, and Harris about her participation in programs led by Alliance Defending Freedom (ADF), a nonprofit law firm created to litigate First Amendment violations affecting the Christian community.²⁵ Senator Hirono questioned Rushing’s ability to render decisions impartially or fairly in cases involving the court-created right to abortion or involving litigants that identify as homosexual or transgender because of Rushing’s internship and speaking engagements with ADF. Senator Blumenthal asked, “Would you perform a same-sex wedding if asked to do so?” In questions related to ADF, Senators Whitehouse, Coons, Blumenthal, Hirono, and Booker relied on the characterization by the Southern Poverty Law Center (SPLC), a progressive activist group that frequently defames ideological opponents.²⁶ In questions related to a separate speaking engagement, Senator Whitehouse asked, “In your view, are Judeo-Christian morality and homosexuality incompatible?” Senator Harris also asked Rushing whether she believed “that LGBT rights cannot be reconciled with religion.”

May 2018 - Judge Peter Phipps²⁷ received questions about his membership in the Knights of Columbus from Senator Harris. Senator Harris asked whether Judge Phipps, as a member of the Knights of Columbus, would “defend the right to life of every human being, from the moment of conception to natural death,” whether he had to “swear an oath in order to join [the] organization,” whether “litigants in [his] court [could] expect a fair hearing” “[w]hen [the] group’s organizational values conflict with litigants’ constitutional rights,” and “how [he would] approach [the] constitutionally-protected right [of abortion] in [his] courtroom” “[a]s a member of a group that avowedly opposes abortion.”

April 2018 - Secretary of State Mike Pompeo²⁸ was asked multiple times by Senator Booker during Secretary Pompeo’s confirmation hearing, “Yes or no, do you believe gay sex is a perversion?” Senator Booker also asked, “Do you have any views that the Muslim faith or people who believe in worshipping ‘other gods,’ is that just something negative in our country?” Senator Coons said during the same hearing, “I think it is important to have a sense on the record of your view of the religion of Islam and of our partnerships in the Muslim world.”

September 2017 - Judge Amy Coney Barrett²⁹ received questions from Senator Whitehouse about her ability to render decisions impartially or fairly because of a petition, which expressed views traditionally held by Catholics on the sanctity of life, marriage, and sexuality,³⁰ that she signed in her private capacity. Senators Feinstein, Whitehouse, and then-Senator Al Franken referred to Judge Barrett’s speaking engagements with ADF and relied on information about it from the SPLC.³¹ Senators Whitehouse, Feinstein, Dick Durbin (D-Ill.), and Hirono questioned her about an article from law school about Catholic judges and recusal and what a Catholic judge would or would not recuse herself from.³² At Judge Barrett’s confirmation hearing, Senator Feinstein infamously said, “Whatever a religion is, it has its own dogma. The law is totally different. And I think in your case, . . . the conclusion one draws is that the dogma lives loudly within you. And that’s of concern when you come to big issues that large numbers of people have fought for for years in this country.” Senator Feinstein added, “Over time, we learn to also judge what they think, and whether their thoughts enable them to be free to observe the law.”

July 2017 - Judge Trevor McFadden³³ received questions from Senator Whitehouse about the statements of belief of Judge McFadden’s church, Falls Church Anglican, and about comments made by an associate pastor at the church. Based on those statements, Senator Whitehouse asked Judge McFadden whether he understood Supreme Court precedent in the court-created right to same-sex marriage, whether this contradicted statements made from the associate pastor, whether Judge McFadden thought “natural law” should “receive greater weight than decisions that may be deemed inconsistent with natural law,” and whether Judge McFadden would “faithfully apply all applicable, binding precedents, regardless of whether they are grounded in ‘natural law.’”

June 2017 - Deputy Director of the Office of Management and Budget Russell Vought³⁴ received questions from Senators Sanders and Chris Van Hollen (D-Md.) about an article written by Deputy Director Vought in his private capacity. It contained the statement that Islam rejects the deity of Jesus Christ and as such cannot provide salvation.³⁵ Vought did so to argue that his alma mater, Wheaton College, appropriately ended its relationship with a professor for failing to adhere to the school’s Christian statement of faith. Senator Sanders asked Vought, “Do you believe that that statement is Islamophobic?” and whether members of other religions were excluded from salvation. After Vought attempted to explain that he was stating Christian theological beliefs, Senator Sanders said, “I would simply say, Mr. Chairman, that this nominee is really not someone who is what this country is supposed to be about” and “I will vote no.” “The issue,” Senator Van Hollen said, “is you are now moving from a

position where you are a staff member in a Republican Study Committee to somebody who's supposed to uphold the public trust for the whole country." Senator Van Hollen continued, "I think it's irrefutable that these kind of comments suggest . . . you are condemning people of all faiths." "It's your comments that suggest a violation of the public trust in what will be a very important position."

¹ Khaleda Rahman, "How Charismatic Catholic Groups Like Amy Coney Barrett's People of Praise Inspired 'The Handmaid's Tale,'" *Newsweek*, September 21, 2020, accessed September 28, 2020, <https://www.newsweek.com/amy-coney-barrett-people-praise-group-inspired-handmaids-tale-1533293>.

² Stephanie Kirchgaessner, "Amy Coney Barrett: spotlight falls on secretive Catholic group People of Praise," *The Guardian*, September 26, 2020, accessed September 28, 2020, <https://www.theguardian.com/us-news/2020/sep/26/amy-coney-barrett-supreme-court-donald-trump-people-of-praise>.

³ "Nominations," U.S. Senate Committee on the Judiciary, video at 2:44:15 to 2:46:52, September 6, 2017, accessed February 7, 2019, <https://www.judiciary.senate.gov/meetings/08/08/2017/nominations>.

⁴ Stephanie Kirchgaessner, "Amy Coney Barrett: spotlight falls on secretive Catholic group People of Praise."

⁵ U.S. Congress, Senate, S. Res. 19, Congressional Record Vol. 165, No. 9, 116th Cong., January 16, 2019, <https://www.congress.gov/congressional-record/2019/1/16/senate-section/article/S270-1>.

⁶ Alexander Bolton, "Hawley warns Schumer to steer clear of Catholic-based criticisms of Barrett," *The Hill*, September 26, 2020, accessed September 28, 2020, <https://thehill.com/homenews/senate/518454-hawley-warns-schumer-to-steer-clear-of-catholic-based-criticisms-of-barrett>.

⁷ Tony Perkins, "Nancy Pelosi Is 'Not Going to Get Into' Defending Religious Liberty?" Family Research Council, September 25, 2020, accessed September 29, 2020, <https://www.frc.org/updatearticle/20200925/pelosi-liberty>.

⁸ "McConnell Defends Religious Liberty in America," Mitch McConnell, December 5, 2019, accessed September 29, 2020, <https://www.republicanleader.senate.gov/newsroom/remarks/mcconnell-defends-religious-liberty-in-america>.

⁹ Alexander Bolton, "Hawley warns Schumer to steer clear of Catholic-based criticisms of Barrett."

¹⁰ Tony Perkins, "The Attacks on Judge Barrett's Faith Are Despicable and Must be Condemned," Family Research Council, September 24, 2020, accessed September 29, 2020, <https://www.frc.org/updatearticle/20200924/attacks-faith>.

¹¹ "Religious Test," The Heritage Guide to the Constitution, accessed February 7, 2019, <https://www.heritage.org/constitution/#!/articles/6/essays/135/religious-test>.

¹² Letter from Union of Orthodox Jewish Congregations of America to U.S. Senate Committee on the Judiciary, February 4, 2019, <https://eppc.org/wp-content/uploads/2019/02/Judiciary-Rel-Test-Qs.pdf>; Sohrab Ahmari, "The Dogma of Dianne Feinstein," *The New York Times*, September 11, 2017, accessed February 4, 2019, <https://www.nytimes.com/2017/09/11/opinion/the-dogma-of-dianne-feinstein.html>; Carl A. Anderson, "A Message from the Supreme Knight," *Knights of Columbus*, January 1, 2019, accessed February 4, 2019, <http://www.kofc.org/en/news/releases/message-from-the-supreme-knight.html>; Don Byrd, "Religious Tests Have No Place in Our Democracy [UPDATED]," *Baptist Joint Committee for Religious Liberty*, January 10, 2019, accessed February 4, 2019, <https://bjconline.org/religious-tests-have-no-place-in-our-democracy-011019/>; Catholic News Service, "No place for 'religious test' in government, says Senate in unanimous vote," *Crux*, January 18, 2019, accessed February 4, 2019, <https://cruxnow.com/church-in-the-usa/2019/01/18/no-place-for-religious-test-in-government-says-senate-in-unanimous-vote/>; David Closson, "Democratic Congresswoman Condemns Religious Bigotry, Standing up to Her Party in a Rare Act of Courage," *Townhall*, February 2, 2019, accessed February 4, 2019, <https://townhall.com/columnists/davidclosson/2019/02/02/democratic-congresswoman-condemns-religious-bigotry-standing-up-to-her-party-in-a-rare-act-of-courage-n2540680>; Matthew Continetti, "Kamala Harris's Outrageous Assault on the Knights of Columbus," *National Review*, January 12, 2019, accessed February 4, 2019, <https://www.nationalreview.com/2019/01/kamala-harris-knights-of-columbus-religious-test/>; Tulsi Gabbard, "Elected leaders who weaponize religion are playing a dangerous game," *The Hill*, January 8, 2019, accessed February 4, 2019, <https://thehill.com/blogs/congress-blog/religious-rights/424362-elected-leaders-who-weaponize-religion-are-playing-a>; Newt Gingrich, "Newt Gingrich: It's Time to Stop Religious Bigotry in Congress," *Newsweek*, January 21, 2019, accessed February 4, 2019, <https://www.newsweek.com/mlk-gingrich>.

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¹³ Chuck Grassley, "Grassley on Judicial Nomination: No religious test should ever be part of our evaluation," news release, October 31, 2017, <https://www.grassley.senate.gov/news/news-releases/grassley-judicial-nomination-no-religious-test-should-ever-be-part-our-evaluation>.

¹⁴ "Nominations," U.S. Senate Committee on the Judiciary, video at 2:03:11 to 2:04:43, 2:13:35 to 2:13:39, February 5, 2019, accessed February 6, 2019, <https://www.judiciary.senate.gov/meetings/02/05/2019/nominations>.

¹⁵ "Nomination Hearing for Deputy Director of White House Budget Office," U.S. Senate Committee on the Budget, video at 44:47 to 45:58, June 7, 2017, accessed February 7, 2019, <https://www.budget.senate.gov/nomination-hearing-for-deputy-director-of-white-house-budget-office>.

¹⁶ David Harsanyi, "The Democratic Party's Holy War On Christian Orthodoxy," *The Federalist*, January 17, 2019, accessed February 5, 2019, <https://thefederalist.com/2019/01/17/democrats-holy-war-catholicism-orthodoxy/>.

¹⁷ Ibid.

¹⁸ Jonathan Leeman, "The 'No Religious Test' Clause and Profoundly Religious Politics," *Religious Freedom Institute*, July 9, 2018, accessed February 5, 2019, <https://www.religiousfreedominstitute.org/cornerstone/the-no-religious-test-clause-and-profoundly-religious-politics>.

¹⁹ "Executive Business Meeting," U.S. Senate Committee on the Judiciary, video at 2:15:19 to 2:15:30, February 7, 2019, accessed February 8, 2019, <https://www.judiciary.senate.gov/meetings/02/07/2019/executive-business-meeting>.

²⁰ "Nominations," U.S. Senate Committee on the Judiciary, video at 2:03:11 to 2:04:43, 2:13:35 to 2:13:39, February 5, 2019, accessed February 6, 2019, <https://www.judiciary.senate.gov/meetings/02/05/2019/nominations>.

²¹ "Barr Responses to Questions For The Record," U.S. Senate Committee on the Judiciary, January 27, 2019, <https://www.judiciary.senate.gov/imo/media/doc/Barr%20Responses%20to%20QFRs.pdf>.

²² "Buescher Responses To Questions For The Record," U.S. Senate Committee on the Judiciary, December 5, 2018, <https://www.judiciary.senate.gov/imo/media/doc/Buescher%20Responses%20to%20QFRs.pdf>; "Matey Responses To Questions For The Record," U.S. Senate Committee on the Judiciary, November 20, 2018, <https://www.judiciary.senate.gov/imo/media/doc/Matey%20Responses%20to%20QFRs.pdf>.

²³ "Learn About Us," Knights of Columbus, accessed February 7, 2019, <https://www.kofc.org/un/en/todays-knights/about-us.html>.

²⁴ "Rushing Responses To Questions For The Record," U.S. Senate Committee on the Judiciary, October 24, 2018, <https://www.judiciary.senate.gov/imo/media/doc/Rushing%20Responses%20to%20QFRs.pdf>.

²⁵ "Who We Are," Alliance Defending Freedom, accessed February 7, 2019, <https://adflegal.org/about-us>.

²⁶ "The Southern Poverty Law Center (SPLC), Phony Lists, and Intimidation," Family Research Council, accessed February 7, 2019, <https://www.frc.org/splc>.

²⁷ "Phipps Responses To Questions For The Record," U.S. Senate Committee on the Judiciary, May 2, 2018, <https://www.judiciary.senate.gov/imo/media/doc/Phipps%20Responses%20to%20QFRs.pdf>.

²⁸ "Nomination of Hon. Mike Pompeo to be Secretary of State," Hearing before the Committee on Foreign Relations United States Senate, 115th Congress, 2nd Session, April 12, 2018, <https://www.foreign.senate.gov/imo/media/doc/S.%20HRG.%20115%20339%20Pompeo1.pdf>.

²⁹ "Barrett Responses To Whitehouse Questions For The Record," U.S. Senate Committee on the Judiciary, <https://www.judiciary.senate.gov/imo/media/doc/Barrett%20Responses%20to%20Whitehouse%20QFRs.pdf>; "Nominations," U.S. Senate Committee on the Judiciary, video at 2:44:15 to 2:46:52, September 6, 2017, accessed February 7, 2019, <https://www.judiciary.senate.gov/meetings/08/08/2017/nominations>.

³⁰ "Letter to Synod Fathers from Catholic Women," *Ethics & Public Policy Center*, October 1, 2015, accessed February 5, 2019, <https://eppc.org/synodletter/>. Judge Barrett signed the letter, apparently when she was a law professor and in her private capacity. The website states: "Note: Affiliations are listed for identification purposes only."

³¹ "Barrett Responses To Feinstein Questions For The Record," U.S. Senate Committee on the Judiciary, September 13, 2017,

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³² "Barrett Responses To Feinstein Questions For The Record," U.S. Senate Committee on the Judiciary, September 13, 2017,
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³³ "McFadden Responses To Questions For The Record," U.S. Senate Committee on the Judiciary, July 5, 2017,
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https://www.budget.senate.gov/nomination-hearing-for-deputy-director_of-white-house-budget-office.
³⁵ Russ Vought, "Wheaton College and the Preservation of Theological Clarity," *The Resurgent*, January 17, 2016, accessed February 7, 2019, <https://theresurgent.com/2016/01/17/wheaton-college-and-the-preservation-of-theological-clarity/>.