IMPOSING NON-LEGAL DUTIES: FAMILY, RELIGION, PATRIOTISM AND THE ROOTS OF CONTEMPORARY CONSERVATISM

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Abstract

This paper recognizes the legal separation of public and private spheres as characteristic of Americans' ideas of democracy secured in their constitution. It asserts that political and social presssures emanating from right-wing or conservative movements are diminishing the distinction between public and private spheres in popular opinion. These movements recognize and encourage the existence of non-legal duties arising from family, patriotism, and religion. In asserting a broad-based social recognition of these duties, modern-day conservatives limit the scope of the private sphere and threaten the political autonomy upon which democratic self-government depends.

A huge conceptual gap exists between telling someone what he must do because the law mandates it and telling him what he should do because cultural values expect it. Yet, this distinction is less significant in the lives of most people than it is in academic or legal discourse. I argue here, with only a whisper of hyperbole, that the cultural diminution of this distinction threatens the basis of democracy by undermining individual autonomy and the protection of it in rights as the focus of law. Western law requires duties to be established by legislation or entered into by contract — nobody is compelled to accept another's worldview or moral sense as determinative of his behavior. Moreover, the cultural imposition of non-legal duties frequently substitutes emotion for rational thought as grounds for imposing obligations. During the last thirty or so years, the emotional basis for recognizing duties has come mostly from social conservatives defending three concepts that have become values in and of themselves: family, religion, and patriotism. These three values form the means of conservatives' attacks on individual rights and

the idea of relative morality in the United States, but they also threaten the perpetuation of liberal western-style democracies everywhere.

The constitutional separation of public and private spheres and the law's recognition of private action as beyond censure, unless or until it interferes with another's equal rights, derives from Enlightenment thought which conceived of morality as a private, not a public concern. Adam Smith, in his *Theory of Moral Sentiments*, contrasted the use of the law to serve moral ends with its use to serve justice:

> Beneficence is always free, it cannot be extorted by force, the mere want of it exposes to no punishment; because the mere want of beneficence tends to do no real positive evil. It may disappoint of the good which might reasonably have been expected, and upon that account it may justly excite dislike and disapprobation: it cannot, however, provoke any resentment which mankind will go along with.
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> There is, however, another virtue, of which the observance is not left to the freedom of our own wills, which may be extorted by force, and of which the violation exposes to resentment, and consequently to punishment. This virtue is justice: the violation of justice is injury: it does real and positive hurt to some particular persons, from motives which are naturally disapproved of.
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> …justice is, upon most occasions, but a negative virtue, and only hinders us from hurting our neighbor.

Smith bases the argument that society cannot impose moral duties upon people on the recognition of their equality, implicitly asserting the right of each person to adopt his or her own moral code as a matter of conscience: "Even the most ordinary degree of kindness or beneficence, however, cannot, among equals, be extorted by force."[1]

The founding of western democracies depended upon the drafting of constitutions that delineated private and public spheres. In order to protect rights, constitutions limited the scope and power of government, or the public sphere, by both enumerating the subjects government could address and establishing parameters on governmental action even as to these subjects. All aspects of life which government was not specifically allowed to address formed the private sphere and were free from governmental interference. The protection of these aspects of life recognized

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[1] ADAM SMITH, THE THEORY OF MORAL SENTIMENTS (D.D. Raphael & A.L. Macfie, eds., Liberty Classics, 1982) at 78–89, 82, 85.

that they were matters of individual belief, values, and volition, what became known as matters of individual conscience, and therefore expressions of individual rights.

In 1776, in the early days of the American Revolution, pamphleteer Richard Price expressed the breadth of the private sphere and its securement from public interference, asserting that the protection of physical safety, civil or political equality, freedom of conscience and one's own moral judgment springs from "one general idea that runs through them all, the idea of self-direction."[2] The fulfillment of this ideal was noted by Rev. Charles Nisbet, a visitor to the United States in 1787. He wrote that popular sentiment expressed "the moral duty of the people to pursue their own happiness"—that each is his own "moral agent [free] to dispose of himself and be his own master in all respects."[3]

The United States Constitution expressed this ideological position in Article I, section 10, known as the contract clause. The clause recognizes a right of individuals to pursue their own desires through private contracts immune from public sector interference. The "contract clause" of the Constitution provides that "No state shall …pass any … law impairing the obligations owing to contracts"; in other words, no perceived public interest, assertion of moral duty, or communitarian ethic shall be deemed superior to the rights of private individuals to contract for their own betterment. American law largely separated law and morality. While certain crimes or behaviors may be both illegal and transgress commonly-held moral norms, they were only illegal because they violated recognized rights.

Statutory and common law soon followed in adopting this principle, as private contract law redesigned American society from hierarchical communities devoted to serving the Christian God and the public good to a secular realm of free and equal individuals pursuing their own dreams, goals, and values. Contract law assumes the two parties to an agreement to be reasonable and competent to act on their own self-interest. Any bargain two such people reach will be subject to legal enforcement. Contract law imposed its own morality, defining virtue as living up to one's contractual commitments; nothing more, nothing less. The individual became the primary political, economic, and social actor — invested with the legal authority and autonomy to vote, purchase, work, marry, relocate, and make a myriad other decisions as a private individual.

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[2] Richard Price, *Observations on the Nature of Civil Liberty in* THE FIRST AMERICAN CONSTITUTIONS, at 156 (U. N.C. Press, 1980).
[3] GORDON S. WOOD, THE RADICALISM OF THE AMERICAN REVOLUTION 305–306 (A.A. Kuopf, 1992).

Jefferson conceived of a free republic as predicated upon open commerce — and the absence of archaic duties based on family relations, social class, or religious values. Law constituted a single authority replacing the multiple sources of authority that had existed in colonial America: family, religion, community. The role of law expressed a new ideology in which individual rights and freedoms dominated.

Legal historian, James Willard Hurst, refers to the tremendous "release of energy," that these legal changes precipitated.[4] The state of Virginia lead the new nation in rewriting its inheritance laws during the Revolution, not only abolishing primogeniture and entail, but allowing girls and illegitimate children to own property. The legal changes certainly reflect the early republic's commitment to encouraging economic development. The abolition of entail benefited creditors and debtors by facilitating borrowing and debt collection. Land became an economic resource that was useful in commerce. To ideologues like Jefferson, however, the essence of this reform was: (1) the consideration of all children as legal equals, and (2) the removal of any imposition upon the oldest son, as sole inheritor of the family estate, to care for his mother and siblings. The law sought to eliminate societal duties or obligations to take care of family members.[5]

During the same time period, Americans undertook to disestablish religion or separate church and state. States eliminated taxes to support churches, ministers, and the parish poor. Federal law prohibited religious test oaths as a condition of democratic rights and freedoms. America employed only volunteer soldiers, not imposing a draft until the 1860s, and defended men from impressment in the War of 1812. Support of one's family, church, and one's country became a voluntary choice made by each individual as a matter of conscience.

During the early and middle decades of the twentieth century, attacks on the American system promoting individual autonomy arose mainly from the left. By the early 1900s, Pragmatists, Progressives, and Christian socialists perceived the Jeffersonian conception of rights as too limiting of government — an impediment to the pursuit of social justice. Yet, national law was built upon rights — they were the essence of law and of the ideology behind creating a

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[4] JAMES WILLARD HURST, LAW AND THE CONDITIONS OF FREEDOM IN THE NINETEENTH-CENTURY UNITED STATES (U. Wisconsin Press, 1956).

[5] Michael Grossberg, *Citizens and Families: a Jeffersonian Vision of Domestic Relations and Generational Change in* THOMAS JEFFERSON AND THE EDUCATION OF THE CITIZEN (James Gilreath, ed., Library of Congress 1989).

constitutional republic. The reformers could not jettison rights; but, they could expand the notion of rights so as to be more amenable to social change. New rights, at least equal to those which the founders argued existed in the nature of man, had to be created. In 1920, Zechariah Chafee of Harvard Law School published *Freedom of Speech*, in which he argued that freedom of speech deserved protection as essential to the creation of participatory democracy, thereby justifying a right not because of its legal and prepolitical nature but because of its instrumental value to political society. Philosophers and legal scholars like John Dewey, Roscoe Pound, and John Harlan argued that legal equality had created social inequality. New rights, given just to those without social power, would have to be created to serve social justice. As Louis Brandeis wrote sixteen years prior to his appointment to the Supreme Court: "Political, social, and economic changes entail the recognition of new rights."[6]

In 1905, Justice Harlan, writing for the Progressive or Pragmatic view that would soon become national law stated:

> I think it to be firmly established that what is called the liberty of contract may, within certain limits, be subjected to regulations designed or calculated to promote the general welfare… [or] the public morals…[7]

The change in the law's protection of contract rights lead to an increase of police powers used to promote the public good and to a corresponding erosion of the legal recognitions of rights in the private sector as immune from governmental interference. The full expression of this change is evident in Justice Felix Frankfurter's opinion in 1940 in which the Supreme Court required all school children, even those with religious objections, to recite the Pledge of Allegiance. The court found the Pledge to implicate matters of religious freedom; but, held that the liberty to one's religious convictions is of secondary importance to the need of the state to foster patriotism and national unity. Frankfurter contended that, "[n]ational unity is the basis of national security," and that to ensure the nation's security, the law may tread upon protected rights of the citizens.[8]

Frankfurter's decision was reversed just a few years later; and while an expansion of the public sector still threatens private sector rights, in the twenty-first century a seemingly greater threat comes from conservatives who use values to limit personal freedoms. Conservatives have

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[6] Samuel D. Warren & Louis D. Brandeis, *The Right to Privacy*, 4 Harv. L. Rev. 193 (1890).
[7] *Lochner v. New York*, 198 U.S. 45 (1905) Harlan dissent, at 67.
[8] *Minersville School District v. Gobitis*, 310 U.S. 586, 599 (1940).

had little success in imposing new legal duties in furtherance of family, religious, and patriotic concerns; but, they have succeeded in creating a culture in which socially-recognized duties compel conformity even without legal dictate. Conformity itself poses a threat to democracy. While certain people may seek security in their values and beliefs by limiting the opportunities of others to dissent from them, a free society depends on a societal openness to debate and disagreement. As Justice William O. Douglas wrote in 1949:

> The right to speak freely and to promote diversity of ideas and programs is . . . one of the chief distinctions that sets us apart from totalitarian regimes. Accordingly a function of free speech under our system of government is to invite dispute. It may indeed best serve its high purpose when it induces a condition of unrest, creates dissatisfaction with conditions as they are, or even stirs people to anger. Speech is often provocative and challenging. It may strike at prejudices and preconceptions and have profound unsettling effects as it presses for acceptance of an idea.[9]

Yet, just as liberals once expanded the public sphere in pursuit of values promoting social justice, conservatives now impose duties within the private sphere in support of family, religious, and patriotic values, often integrating them as reinforcing each other.

Recent assertions of family duties not recognized in law directly contravene the intentions of the nation's liberal founders. Welfare reform in the United States since 1980 has contended that caring for needy relatives, young or old, is a family rather than governmental responsibility. The Family Protection Act of 1981, defeated in Congress, set out as its purpose "to emphasize family responsibilities in education, … [economic] assistance, religion, and other areas."[10] It never provided the source of these supposed duties or responsibilities. For many the source is religion.

Many Christians are not content to rely on their religious views as the basis for their own behaviors; they want to impose these views on others. Bill Donohue, President of the Catholic League, argues that non-religious and secular people are mentally ill and need to be involved in psychotherapy.[11] In a similar vein, a Constitutional amendment encouraging prayer in the public schools has been proposed at least ten times since 1962, despite the fact that no laws inhibit any

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[9] *Terminiello v. Chicago*, 337 U.S. 1, 4–5 (1949).
[10] Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104–193, 110 Stat. 2105 (1996); Karen Flax, *Woman's Rights and the Proposed Family Protection Act*, 36 U. Miami L. Rev. 141 (1981).
[11] Brian Tashman, *Bill Donahue: Non-Religious People Need Therapy Since They Die Prematurely and are Disproportionately Insane*, RIGHT WING WATCH, Dec. 5, 2014, http://www.rightwingwatch.org/content/bill-donohue-non-religious-people-need-therapy-they-die-prematurely-and-are-disproportionate (last visited Jan. 14, 2015).

student from engaging in silent prayer at any time during the school day nor from audible prayer at lunch or recess.[12]

The law in the United States permits abortion prior to the last trimester of pregnancy. Yet, that law has not stopped Christian opponents of abortion from harassing both doctors and patients in asserting religious and family duties.[13] A leader in the Quiverfull movement, composed largely of evangelical Christians, argues that the Bible requires wives to submit to their husbands' authority, to refrain from all forms of birth control, and to devote themselves solely to child-rearing and household duties.[14] Her assertions are hardly anomalistic. A recent Pew study found that 90% of evangelical Christians believed that the husband should function as the head of the household.[15]

Just as religion is frequently used in support of family-based duties, it has become comingled with patriotism. In 2013, talk show host Bryan Fischer argued that it was everyone's patriotic duty to worship God: "When you worship God, … you are doing your patriotic duty."[16] While it may be easy to dismiss radio personalities, these same values have embedded themselves in significant organizations. The Boy Scouts of America, numbering about 2.6 million participants, stresses both patriotism and religion, expecting a member to be "reverent toward God" and "faithful in his religious duties" while also taking an oath to perform his "duty" to the United States.[17] The State of Texas, just a few years after encouraging its public school history

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[12] David Van Biema, *Spiriting Prayer Into School*, TIME, Apr. 27, 1988, http://www.cnn.com/ALLPOLITICS/1998/04/20/time/pols.schoolprayer.html (last visited Jan. 14, 2015); *Votes in Congress*, THE NEW YORK TIMES, June 7, 1998, http://query.nytimes.com/gst/fullpage.html?res=9C03EED61F3BF934A35755C0A96E958260 (last visited Jan. 14, 2015); *Senator Byrd Proposes Constitutional Prayer Amendment*, CATHOLIC NEWS AGENCY, May 2, 2006, http://www.catholicnewsagency.com/news/senator_byrd_proposes_constitutional_prayer_amendment/ (last visited Jan. 14, 2015); Katharine Q. Seelye, *Republicans in Congress Renew Push for Vote on School Prayer Amendment*, THE NEW YORK TIMES, July 16, 1996, http://query.nytimes.com/gst/fullpage.html?res=9A0CE0D61E39F935A25754C0A960958260 (last visited Jan. 14, 2015).

[13] Cassie Murdoch, *Payback is a Bitch for Abortion Clinic Protestors, Thanks to a Brilliant Landlord*, JEZEBEL, Mar. 30, 2012, http://jezebel.com/5897699/brilliant-abortions-clinic-landlord-teaches-protesters-that-payback-is-a-bitch (last visited Jan. 14, 2015); Kathleen Gilbert, *Abortion Protestors Picket Middle School of Clinic Owner's Daughter*, LIFESITENEWS, Sep. 14, 2011, https://www.lifesitenews.com/news/abortion-protesters-picket-middle-school-of-clinic-owners-daughter/ (last visited Jan. 14, 2015).

[14] MARY PRIDE, THE WAY HOME: BEYOND FEMINISM, BACK TO REALITY (HomeLife, Inc., 2010).

[15] SALLY K. GALLAGHER, EVANGELICAL IDENTITY AND GENDERED FAMILY LIFE (Rutgers U. Press, 2003).

[16] Kyle Mantyla, *Fischer: "It Is Your Patriotic Duty to Worship God"*, RIGHT WING WATCH, July 18, 2013, http://www.rightwingwatch.org/content/fischer-it-your-patriotic-duty-worship-god (last visited Jan. 14, 2015).

[17] *Boy Scouts*, BOY SCOUTS OF AMERICA, 2015, http://www.scouting.org/Home/BoyScouts.aspx (last visited Jan. 14, 2015); *Duty to God*, BOY SCOUTS OF AMERICA, http://www.scouting.org/filestore/pdf/512-879_WB.pdf.

textbooks to diminish the prominence of "atheistic" Thomas Jefferson, designated Moses as a "key influence" on the founding of the new nation.[18]

Former Governor of Arkansas and candidate for President, Mike Huckabee, recently a FOX News employee, argued that there exists a duty to prevent secularization. He argued that people have to understand that they are not only "accountable to the police … one day, we will stand in judgment before God."[19] Secularists do not fear God, he argued, and therefore are more likely to transgress social norms.

From this perspective, disasters can provide a necessary stimulus to correct social ills and reimpose duties. Numerous ministers and rabbis saw Hurricane Katrina as evidence of God's wrath at America's permissive society and both Rev. Pat Robertson and Rev. Jerry Falwell contended that the September 11, 2001 attacks on The World Trade Center were punishments for American toleration of sin.[20] Dr. James Dobson, in an interview with Larry King, celebrated the effects of those attacks, stating: "You know, we had this resurgence of patriotism and this renewed religious faith, belief in God. We had these banners up -- United We Stand. … There was a sense of unity."[21] In the renewal of patriotism Americans accepted greater responsibilities and duties.

One sign of this cultural change was the playing of "God Bless America" at baseball games. Custom requires men to remove their hats during the playing of the national anthem; but "God Bless America" is not the national anthem. Many conservative Christians wish it were, however, as it incorporates a religious message into a patriotic verse. In 2008 a fan watching a Yankees' baseball game in New York refused to stay in his place and remove his hat during the playing of "God Bless America," choosing instead to visit the men's room. As a result, he was removed from the stadium.[22] Apparently the playing of the song is not enough of an imposition. People must

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[18] R.B. Bernstein, *Did the Founding Fathers Really Turn to Moses for Inspiration?*, WE'RE HISTORY, Dec. 1, 2014, http://werehistory.org/moses-for-inspiration (last visited Jan. 14, 2015).
[19] Max Read, *Mike Huckabee Says Sandy Hook Shooting Happened Because We "Removed God from Our Schools"*, GAWKER, Dec. 14, 2012, http://gawker.com/5968633/mike-huckabee-says-conn-shooting-happened-because-we-removed-god-from-our-schools (last visited Jan. 14, 2015).
[20] *Hurricane Katrina as Divine Retribution*, WIKIPEDIA, Dec. 22, 2013, http://en.wikipedia.org/wiki/Hurricane_Katrina_as_divine_retribution (last visited Jan. 14, 2015); Veracifier, *Falwell and Robertson on the 700 Club After 9/11*, YOUTUBE, Nov. 7, 2007, https://www.youtube.com/watch?v=H-CAcdta_8I (last visited Jan. 14, 2015).
[21] *I Believe in American Patriotism*, ONEPLACE.COM, July 4, 2001, http://www.oneplace.com/ministries/family-talk/listen/choosing-to-be-happy-201872.html (last visited Jan. 14, 2015).
[22] Sewell Chan, *On Yankee Stadium Restroom Dispute, the City Settles*, CITY ROOM, July 7, 2009, http://cityroom.blogs.nytimes.com/2009/07/07/on-yankee-stadium-restroom-dispute-the-city-settles/ (last visited Jan. 14, 2015); Alison Gendar, *Fan Sues NYPD; Kicked Out of Yankee Stadium for Using Restroom During "God*

now stand at attention and remove their hats. No law requires this, but a sense of religious and patriotic duty does.

Showing respect for the nation's flag and ritualistic devotions to it have also prompted social responses inconsistent with federal laws protecting free expression. Students in New York City, Oak Park, California and New Town, North Dakota have recently been disciplined for their failures to recite the Pledge of Allegiance in school.[23] In Garden City, Florida an adult man was escorted from a city commission meeting for refusing to stand for the Pledge.[24] Just this spring, at the University of California at Irvine, leaders of the student government, in respect of the diversity of students at the school, voted to banish the American flag from the office of the student government. An uproar, led by local military veterans and other social conservatives, caused the school to denounce the action and suspend student government meetings. A sociology professor at the school, David S. Meyer, saw the furor as an attempt to establish "a litmus test for student patriotism."[25]

A national movement to impose family, religious, and patriotic duties may have its fullest expression in community service. Courts impose it in lieu of jail time and schools require it of students.[26] In 2013, Congressman Charles Rangel proposed that every young man and woman between the ages of 18 and 25 donate two full years to compulsory service to the nation. Arguing

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Bless America" – Suit, DAILY NEWS, Apr. 17, 2009, http://www.nydailynews.com/new-york/fan-sues-nypd-kicked-yankee-stadium-restroom-god-bless-america-suit-article-1.362905 (last visited Jan. 14, 2015); James P. Marsh Jr., *Why I Sit Out "God Bless America"*, THE WASHINGTON POST, May 31, 2013, http://www.washingtonpost.com/opinions/why-i-sit-out-god-bless-america/2013/05/31/32a16634-c952-11e2-9f1a-1a7cdee20287_story.html (last visited Jan. 14, 2015).

[23]Shadee Ashtari, *Group Condemns Teacher Who Allegedly Bullied Atheist Student for Opting Out of Pledge*, THE HUFFINGTON POST, May 27, 2014, http://www.huffingtonpost.com/2014/05/27/atheist-student-pledge-of-allegiance_n_5399090.html (last visited Jan. 14, 2015); Mollie Reilly, *School Apologizes After Atheist Student "Intimidated" Into Standing For Pledge Of Allegiance*, THE HUFFINGTON POST, Oct. 2, 2014, http://www.huffingtonpost.com/2014/10/02/pledge-of-allegiance-apology_n_5921126.html (last visited Jan. 14, 2015); Andrea Jordan, *Pledge of Allegiance Controversy at New Town School*, MINOT DAILY NEWS, Sep. 15, 2014, http://www.minotdailynews.com/page/content.detail/id/611789.html (last visited Jan. 14, 2015).

[24] Josh Israel, *Mayor Forces Man to Leave Public Meeting Because He Won't Stand During Prayer*, THINKPROGRESS, Aug. 31, 2014, http://thinkprogress.org/justice/2014/08/31/3477694/florida-mayor-elects-citizen (last visited Jan. 14, 2015).

[25] Emily Foxhall & Teresa Watanabe, *At UC-Irvine, Some Call Flag Flap Overblown*, LOS ANGELES TIMES, March 11, 2015, at B1 and B7.

[26] Stewart Ain, *The Logic of "Mandatory" Volunteerism*, THE NEW YORK TIMES, Mar. 23, 2003, http://www.nytimes.com/2003/03/23/nyregion/the-logic-of-mandatory-volunteerism.html (last visited Jan. 14, 2015); Diana Ryan, *Required Community Service in High Schools and Civic Engagement*, May 3, 2012, http://commons.trincoll.edu/edreform/2012/05/required-community-service-in-high-schools-and-civic-engagement/ (last visited Jan. 14, 2015); *Required Community Service*, THE COLLEGE OF WILLIAM & MARY, 2015, http://www.wm.edu/offices/oce/linksresources/communityservice/index.php (last visited Jan. 14, 2015).

that every American should have duties to his country, he stated: "Being a citizen of this great nation comes with great responsibility. The Universal National Service Act and All American Selective Service Act [that he proposed, would] ensure the cost of freedom and benefits of being an American are shared by all Americans."[27] The proposal generated significant support from conservatives. One editorial writer asserted that, "Any person who can't answer, 'So, how did you serve your country?', through any form of public service should feel ashamed." The author, an instructor in the Marine Corps, goes on to assert that "[e]veryone . . . should do more in order to build a culture of sacrifice."[28] A culture of sacrifice conforms well to Christian teachings, but seems incongruous in a nation dedicated to protecting an individual right to pursue happiness.

Why would Americans, arguably the most independent rights-loving people in the world, succumb to this imposition of duties? In part, it may be a desire for community in a world of fragmentation and disengagement. But, it is more than that; it reflects a longing for a simpler time in which people shared an integrated belief and value system — when politics, religion, and the family reinforced one another. That simpler time may never have existed, but it forms an ideal that many conservatives still love — and want to impose on the rest of us. Most importantly, it misconstrues law. American law, from the Constitution down, has prioritized the protection of individual rights. The new conservatives would use it as a means of imposing values — a goal completely inconsistent with the founders' intentions.

A reactionary defense of parochial interests — one's own family, one's own religion, one's own country — repudiates the broad-minded cosmopolitanism that produced the American Revolution and the United States Constitution. The danger of the current trend toward parochialism is that it diminishes a cultural respect for freedom of thought and leads inevitably to a denial of rights. It limits the private sphere. Duties rooted in patriotism, religion, and family are products of individual values. One might feel compelled to join the army, another to pray to a chosen God, yet another to quit working to take care of an aging parent — but, when that individual insists that others make the same choice he evinces a lack of respect for his neighbor. Democracy depends in part upon a private sphere in which individual citizens are able to make their own

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[27] Charles Rangel, *All Americans Have a Duty to Defend Our Nation: Column*, USA TODAY, Feb. 15, 2013, http://www.usatoday.com/story/opinion/2013/02/15/two-years-compulsory-service-rangel/1922597/ (last visited Jan. 14, 2015).

[28] Carl Forsling, *America Needs to Breed a Culture of Voluntary Public Service*, TASK AND PURPOSE, Feb. 5, 2015, http://taskandpurpose.com/america-needs-breed-culture-voluntary-public-service/ (last visited Mar. 16, 2015).

political choices free from societal or cultural pressures. When the freedom to live one's life one's own way is threatened, democracy itself is under attack.

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[6] *Duty to God*, BOY SCOUTS OF AMERICA, http://www.scouting.org/filestore/pdf/512-879_WB.pdf.

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[12] Gilbert, Kathleen, *Abortion Protestors Picket Middle School of Clinic Owner's Daughter*, LIFESITENEWS, Sep. 14, 2011, https://www.lifesitenews.com/news/abortion-protesters-picket-middle-school-of-clinic-owners-daughter/ (last visited Jan. 14, 2015).

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