

Case No. 14-2184

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

ADA MERCEDES CONDE-VIDAL, *et al.*,
Plaintiffs-Appellants,

v.

DR. ANA RIUS-ARMENDARIZ, in her official capacity as Secretary of the
Health Department of Puerto Rico, *et al.*,
Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO, THE HON. JUAN M. PÉREZ-GIMÉNEZ PRESIDING,
CASE No. 3:14-cv-01253-PG

**BRIEF OF AMICI CURIAE ANTI-DEFAMATION LEAGUE ·
AMERICANS UNITED FOR SEPARATION OF CHURCH AND STATE ·
BEND THE ARC: A JEWISH PARTNERSHIP FOR JUSTICE · CENTRAL
CONFERENCE OF AMERICAN RABBIS · GLOBAL JUSTICE
INSTITUTE · HADASSAH, THE WOMEN'S ZIONIST ORGANIZATION
OF AMERICA · THE HINDU AMERICAN FOUNDATION · INTERFAITH
ALLIANCE FOUNDATION · THE JAPANESE AMERICAN CITIZENS
LEAGUE · JEWISH SOCIAL POLICY ACTION NETWORK ·
KESHET · METROPOLITAN COMMUNITY CHURCHES · MORE
LIGHT PRESBYTERIANS · THE NATIONAL COUNCIL OF JEWISH
WOMEN · NEHIRIM · PEOPLE FOR THE AMERICAN WAY
FOUNDATION · PRESBYTERIAN WELCOME · RECONCILINGWORKS:
LUTHERANS FOR FULL PARTICIPATION · RECONSTRUCTIONIST
RABBINICAL COLLEGE AND JEWISH RECONSTRUCTIONIST
COMMUNITIES · RELIGIOUS INSTITUTE, INC. · SIKH AMERICAN
LEGAL DEFENSE AND EDUCATION FUND · SOCIETY FOR
HUMANISTIC JUDAISM · T'RUAH: THE RABBINIC CALL FOR
HUMAN RIGHTS · WOMEN OF REFORM JUDAISM · AND WOMEN'S
LEAGUE FOR CONSERVATIVE JUDAISM · IN SUPPORT OF
APPELLANTS AND SUPPORTING REVERSAL**

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CORPORATE DISCLOSURE STATEMENT OF *AMICI CURIAE*

Pursuant to Federal Rule of Appellate Procedure 26.1, amici Anti-Defamation League; Americans United for Separation of Church and State; Bend the Arc: A Jewish Partnership for Justice; Central Conference of American Rabbis; Global Justice Institute; Hadassah, The Women's Zionist Organization of America; The Hindu American Foundation; Interfaith Alliance Foundation; The Japanese American Citizens League; Jewish Social Policy Action Network; Keshet; Metropolitan Community Churches; More Light Presbyterians; The National Council of Jewish Women; Nehirim; People for the American Way Foundation; Presbyterian Welcome; ReconcilingWorks: Lutherans For Full Participation; Reconstructionist Rabbinical College and Jewish Reconstructionist Communities; Religious Institute, Inc.; Sikh American Legal Defense and Education Fund; Society for Humanistic Judaism; T'ruah: The Rabbinic Call for Human Rights; Women of Reform Judaism; and Women's League for Conservative Judaism state that they are nonprofit organizations, they have no parent companies, and they have not issued shares of stock.

/s/ Rocky C. Tsai
Rocky C. Tsai, Counsel for *Amici Curiae*

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IDENTITY AND INTEREST OF *AMICI*

Amici curiae are a diverse group of religious and cultural organizations that advocate for religious freedom, tolerance, and equality. See Appendix A filed herewith. *Amici* have a strong interest in this case due to their commitment to religious liberty, civil rights, and equal protection of law.

This brief is filed with the consent of all parties, pursuant to Federal Rule of Appellate Procedure 29(a). No party or party's counsel authored this brief in whole or in part or financially supported this brief, and no one other than *amici curiae*, their members, or their counsel contributed money intended to fund the preparation or submission of this brief.

SUMMARY OF ARGUMENT

Amici support appellants' challenge to the constitutionality of the Commonwealth of Puerto Rico's marriage ban, including Title 31, Section 221 of the Puerto Rico Civil Code (the "Marriage Ban"). *Amici* contend that the Marriage Ban violates not only the Fourteenth Amendment's Due Process and Equal Protection Clauses, but also the First Amendment's Establishment Clause. A decision overturning the Marriage Ban would assure full recognition of civil marriages in Puerto Rico, while allowing religious groups the freedom to choose how to define marriage for themselves. Many religious traditions, including those practiced by many of the undersigned *amici*, attribute religious significance to the institution of marriage. *See Turner v. Safley*, 482 U.S. 78, 96 (1987) ("[M]any religions recognize marriage as having spiritual significance."). But religious views differ regarding what marriages qualify to be solemnized. Under the First Amendment, which safeguards religious liberty *for all*, selective religious understandings cannot define marriage recognition for purposes of civil law.

It is a violation of the First Amendment to deny individuals the right to marry on the grounds that such marriages would offend the tenets of a particular religious group. *Cf. Loving v. Virginia*, 388 U.S. 1, 11–12 (1967) (rejecting religious justification for law restricting right of individuals of different races to marry). Puerto Rico's Marriage Ban flouts this fundamental principle by

incorporating a particular religious definition of marriage into law—a definition inconsistent with the faith beliefs of many religious groups, including many of the undersigned *amici*, who embrace an inclusive view of marriage. Puerto Rico had no legitimate secular purpose in adopting that selective religious definition of marriage. The legislative history demonstrates that those responsible for passing the Marriage Ban had the specific motive of tying the definition of marriage to a particular religious tradition’s understanding of that civil institution. The Marriage Ban is therefore unconstitutional under the Establishment Clause.

This Establishment Clause analysis also supports appellants’ argument that the Marriage Ban is unconstitutional under the Fourteenth Amendment’s Equal Protection Clause. Under a line of cases decided by the U.S. Supreme Court, including most recently *United States v. Windsor*, 133 S. Ct. 2675 (2013), and *Lawrence v. Texas*, 539 U.S. 558 (2003), moral condemnation of an identifiable group is never a legitimate governmental interest. While *amici* recognize the role that religious and moral beliefs have in shaping the public policy views of citizens and legislators, governmental action motivated by such beliefs alone and directed inherently toward the disparagement of a single identifiable group cannot survive even the lowest level of constitutional review. This principle, which is common to Establishment Clause and Equal Protection analysis alike, renders the Marriage Ban unconstitutional under both provisions.

Finally, contrary to the arguments of some supporters, the Marriage Ban is not rationally related to a legitimate governmental interest in protecting religious liberty. Such arguments fail to explain how a ruling invalidating the Marriage Ban would interfere with religious liberty in any way. The case at bar concerns whether same-sex couples are entitled to the benefits of civil marriage. Concerns related to the potential for anti-discrimination suits are a red herring: cities and municipalities in Puerto Rico already bar discrimination on the basis of sexual orientation. While protecting religious liberty is a legitimate governmental interest in general, what the proponents of the Marriage Ban actually urge is that Puerto Rico be allowed to enact a particular religious view of marriage to the exclusion of other religious views. Governments have no legitimate interest in enacting legislation that merely adopts a particular version of Judeo-Christian religious morality. Far from serving a legitimate governmental interest, using the law to enshrine such religious doctrine would violate both the Establishment Clause and the Fourteenth Amendment.

ARGUMENT

The Establishment Clause’s secular purpose requirement and the Fourteenth Amendment’s Equal Protection Clause speak with one voice against legislative resort to moral and religious condemnation of identifiable groups: the government’s action must serve a legitimate, secular purpose. The purpose doctrines under both Clauses are cut from the same cloth, and analysis under one can inform the other.

The U.S. Supreme Court has long implicitly acknowledged the connection between religious justifications and the Equal Protection guarantee. The Supreme Court’s decision overturning a Virginia law that forbade marriage between persons of different races is illustrative. In *Loving v. Virginia*, the Court dismissed a Virginia trial judge’s proffered religion-based rationale, which cited God’s hand in creating different races, and recognized instead that “[t]here is patently no legitimate overriding purpose independent of invidious racial discrimination which justifies this classification.” 388 U.S. 1, 11 (1967). Ultimately, the Court concluded that the anti-miscegenation law served no secular purpose and was based on nothing more than racial discrimination—even if grounded in moral or religious belief.

The Northern District of California’s decision in *Perry v. Schwarzenegger* (held by the Supreme Court to be the final decision overturning California’s

Proposition 8) further illustrates the overlap between these doctrines. 704 F. Supp. 2d 921 (N.D. Cal. 2010), *aff'd sub nom. Perry v. Brown*, 671 F.3d 1052 (9th Cir. 2012), *vac'd for lack of standing to bring appeal sub nom. Hollingsworth v. Perry*, 133 S. Ct. 2652 (2013). Drawing upon both the First and Fourteenth Amendments, the court observed the distinction in constitutional law between “secular” and “moral or religious” state interests. *Id.* at 930–31 (citing *Lawrence*, 539 U.S. at 571, and *Everson v. Bd. of Educ. of Ewing Twp.*, 330 U.S. 1, 15 (1947)). The court recognized that the state had no legitimate “interest in enforcing private moral or religious beliefs without an accompanying secular purpose.” *Id.* The evidence presented in *Perry*’s lengthy bench trial established that “moral and religious views form[ed] the only basis for a belief that same-sex couples are different from opposite-sex couples.” *Id.* at 1001. Acknowledging the lack of a secular purpose, the *Perry* court ultimately concluded that the only conceivable basis for Proposition 8 was a “private moral view that same-sex couples are inferior.” *Id.* at 1003. Such moral disapproval of a group is not a legitimate governmental interest. *Id.*

The Establishment Clause supports an outcome here similar to *Perry*’s. Just as the Supreme Court has rejected moral justifications under the Equal Protection Clause, Establishment Clause concerns arise when legislation is motivated by a

particular *religious* doctrine. The Marriage Ban’s failings under the Establishment Clause illuminate and inform its failings under the Equal Protection Clause.

I. The Puerto Rico Marriage Ban violates the Establishment Clause because it was enacted with the purpose of imposing a particular religious understanding of marriage as law.

Religious belief can play an important role in the formation of some people’s public policy preferences. But that role must be tempered by principles of religious liberty, as “political division along religious lines was one of the principal evils against which the First Amendment was intended to protect.” *Comm. for Pub. Educ. & Religious Liberty v. Nyquist*, 413 U.S. 756, 796 n.54 (1973). The Puerto Rico Marriage Ban runs afoul of longstanding Establishment Clause principles because it has a primarily religious purpose—to write one particular religious understanding of marriage into the law—at the expense of positions taken by other religious traditions.

A. The Establishment Clause prohibits laws that have the primary purpose or effect of aiding or favoring one religious view over others.

Since this country’s founding, the concept of religious liberty has included the equal treatment of all faiths without discrimination or preference. *See Larson v. Valente*, 456 U.S. 228, 244 (1982) (“The clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another.”). As the Supreme Court explained in *Larson*:

Madison’s vision—freedom for all religion being guaranteed by free competition between religions—naturally assumed that every denomination would be equally at liberty to exercise and propagate its beliefs. But such equality would be impossible in an atmosphere of official denominational preference. Free exercise thus can be guaranteed only when legislators—and voters—are required to accord to their own religions the very same treatment given to small, new, or unpopular denominations.

Id. at 245; *see also* Arlin M. Adams & Charles J. Emmerich, *A Heritage of Religious Liberty*, 137 U. Pa. L. Rev. 1559, 1636 (1989) (“The . . . proposition, that government may not prefer one religion over any other, receives overwhelming support in the American tradition of church and state.”).

“[I]n . . . light of its history and the evils it was designed forever to suppress,” the Supreme Court has consistently given the Establishment Clause “broad meaning.” *Everson*, 330 U.S. at 14–15. The Supreme Court has invalidated laws that aid one particular religion. *Id.* at 15–16 (“Neither a state nor the Federal Government can . . . pass laws which aid one religion, aid all religions, or prefer one religion over another.”). It has also rejected any law that has the purpose or primary effect of advancing certain religious denominations over others or advancing religious over non-religious beliefs. *See, e.g., Larson*, 456 U.S. at 244, 247 (invalidating a law that distinguished between religious organizations based on how they collected funds because it “clearly grant[ed] denominational preferences”); *Edwards v. Aguillard*, 482 U.S. 578 (1987) (holding law requiring

teaching of creationism when evolution is taught unconstitutional because it lacked a secular purpose). The Establishment Clause “forbids alike preference of a religious doctrine or the prohibition of theory which is deemed antagonistic to a particular dogma.” *Epperson v. Arkansas*, 393 U.S. 97, 103, 106 (1968) (striking down state ban on teaching evolution in public schools where “sole reason” for the law was that evolution was “deemed to conflict with a particular religious doctrine”). In *Lemon v. Kurtzman*, the Supreme Court distilled the above-described principles into a test that remains instructive: a law must have a secular purpose; its primary effect cannot be to advance or inhibit religion; and it must not result in excessive governmental entanglement with religion. 403 U.S. 602, 622 (1971).

Relevant here is the secular purpose requirement. The Supreme Court has discussed this rule at length, noting that “the secular purpose required has to be genuine, not a sham, and not merely secondary to a religious objective.” *McCreary Cnty. v. ACLU of Ky.*, 545 U.S. 844, 864 (2005). The Court has emphasized that this test has “bite,” such that a law will not survive scrutiny under the Establishment Clause simply because “some secular purpose” is constructed after the fact. *Id.* at 865 & n.13.

The Court has explained that examination of the purpose of a law “is a staple of statutory interpretation that makes up the daily fare of every appellate court in

the country.” *Id.* at 861. Employing traditional tools of statutory interpretation allows a court to determine legislative purpose without resort to any “judicial psychoanalysis of a drafter’s heart of hearts.” *Id.* at 862. Specifically, in examining a law’s “preeminent purpose,” courts look to a variety of sources, including legislative history, statements on the record, and testimony given by supporters. *Edwards*, 482 U.S. at 587, 591–92.

B. The Puerto Rico Marriage Ban was enacted with a religious purpose based on a particular religious understanding of marriage.

Section 221 of Puerto Rico’s Civil Code was amended in 1999 to state in pertinent part: “Any marriage between persons of the same sex or transsexuals contracted in other jurisdictions shall not be valid or given juridical recognition in Puerto Rico.” P.R. LAWS ANN. tit. 31, § 221.

Supporters of the law made no secret of the religious motivations behind it. Numerous religious organizations wrote legislators during deliberations over House Bill 1013 (which became Section 221), imploring them to forbid marriages between homosexuals on moral, biblical, and spiritual grounds. Indeed, the lead sponsors of the Bill, Epifanio Jiménez and Carlos Díaz, presented it to the legislature after receiving a petition from two religious groups and evangelist Jorge Raschke, who sought a bill “that clearly prohibits marriage between persons of the

same sex.” Juanita Colombani, *Cero Nupcias Entre Homosexuales [Zero Nuptials Between Homosexuals]*, *El Nuevo Dia* (P.R.), Feb. 9, 1997.¹

The largest evangelical Christian organization in Puerto Rico, Iglesia de Dios Pentecostal (or the Pentecostal Church of God), submitted a letter on behalf of its more than 550 congregations asking Puerto Rican legislators to ban gay marriage. The Church wrote: “We make an appearance before this worthy Commission as an evangelical and fundamentalist Christian Church to expound and defend ‘the rights of God,’ his ‘copyright’ as creator of everything.” *Ponencia del Rev. Hector Rivera, Secretario de la Iglesia de Dios Pentecostal M.I., Region de Puerto Rico, en relacion al P. de la C. 1013*, (Oct. 8, 1997) at 2, available at <http://www.oslpr.org/1997-2000/B1UNW6FA.pdf> (last visited Dec. 8, 2014). Citing passages from the Bible, the Church continued, “Jewish law would have rejected the ‘sodomites’ (synonymous with homosexual) in Israel (Deut. 23:17) because God abhorred it.” *Id.* at 5-6. And in a final appeal to the Bill’s supporters, the Church concluded by “congratulating the proponents of this project for the sensitivity shown in grasping this *moral, social, and spiritual problem, which marriage between persons same sex represents.*” *Id.* at 6 (emphasis added).

Other supporters, including Puerto Rico’s religious leaders, also couched their support for the proposed law in overtly religious terms. Reverend Rudolfo

¹ Spanish-language sources and their English translations may be found in Appendix B filed herewith.

Font, founder of the Fountain of Living Water Christian Mission, wrote to legislators: “Our people are a Christian people and although I personally love all our brethren, we strongly condemn their deviant sexual behavior because *it is against divine principles* and even against nature. . . . Those seeking marriage between same-sex couples must recognize that God, life and nature have not granted this right because it is not a right.” Rev. Rodolfo Font, Misión Cristiana Fuente de Agua Viva Pabellón de la Fe, *Ponencia al Proyecto de la Cámara 1013 para adicionar un nuevo inciso (7) al Artículo 71 del Código Civil de Puerto Rico*, at 2 (emphasis added), available at <http://www.oslpr.org/1997-2000/B1UNW6BW.pdf> (last visited Dec. 8, 2014). Likewise, the Council on the Church of God “M.B.” of Puerto Rico argued that the law was necessary for “maintaining [the] sound moral and spiritual values” of the community and noted that the Puerto Rican people “believe in God, read the Bible, and live with fear and reverence for his Word.” *Posicion del Concilio de la Iglesia de Dios “M.B.” de Puerto Rico* (Oct. 15, 1997) at 1, available at <http://www.oslpr.org/1997-2000/B1UNW739.pdf> (last visited Dec. 8, 2014).

Various advocates for the law likewise made statements explicitly linking it to a particular Judeo-Christian definition of marriage. Reverend Avildasir Díaz Cruz of the Christian Union Missionary Movement said, “*The entire world knows that the union of a man and a woman is what was ordained by God. . . .* The

Bible points to the homosexual very clearly [that his conduct is a sin].” *Ponencia del Rvdo. Avildasir Díaz Cruz, ante la Comisión De Lo Jurídico Civil*, at 1 (citing 1 Corinthians 6:9) (emphasis added), available at <http://www.oslpr.org/1997-2000/B1UNW6CF.pdf> (last visited Dec. 8, 2014). The Evangelical Council of Puerto Rico wrote in support of the law that “***Christian morality, as expressed in the Bible, only recognizes as valid the marriage between persons of the opposite sex.***” *Letter from Reverend Moisés Rosa Ramos, Secretario Ejecutivo, Concilio Evangelico de Puerto Rico, to the House of Representatives* (Oct. 7, 1997) at 1 (emphasis added), available at <http://www.oslpr.org/1997-2000/B1UNW6E2.pdf> (last visited Dec. 8, 2014). And the International Association of United Pastors and Church Leaders, in an interest statement quoting the Bible seven times, wrote: “**The Word of God speaks to us of man and woman** everything that is out of this is out of the Word we cannot support.” *Letter from Dr. Osvaldo Font, Presidente, Asociación de Pastores y Líderes Unidos, to the House of Representatives* (Oct. 14, 1997) at 1, available at <http://www.oslpr.org/1997-2000/B1UNW6PM.pdf> (last visited Dec. 8, 2014). If that were not clear enough, the ministers’ statement concludes: “**men committing shameless acts with men** . . . are worthy of death.” *Id.* at 2 (citing Romans 1:32).

The fundamental message of those backing the law was thus that a vote in favor of it would preserve and protect a specific religious definition of marriage “ordered by God” and traditional religious values.

Many laws could or do have religious support and are still constitutional. But two characteristics of this law distinguish it from other laws that hew to religious traditions. First, most such laws do not arise from a comparable level of religious and morality-based rhetoric in the public record. The prominent role of religious and moral proselytizing in the public record should raise concerns with this Court.

Second, laws that were partly influenced by religious considerations are constitutional if their *primary* purpose and effect are secular. For example, the beliefs of many religious adherents, including many Muslims, Mormons, and Methodists, require that they abstain from alcohol. And various laws restricting the sale and consumption of alcohol exist throughout the United States. *See, e.g.*, Ky. Rev. Stat. § 242.185 (permitting dry counties); 23 U.S.C. § 158 (National Minimum Drinking Age Act of 1984). Religious and moral understandings may have played a part in the decisions of some lawmakers to pass such laws. But unlike the Marriage Ban, constitutional alcohol laws have legitimate, secular

purposes—preventing driving deaths or protecting children from addiction—and their primary effect is to advance these governmental interests, not religion.

Conversely the Marriage Ban’s primary purpose was not secular. In fact, as measured at the time of enactment, the Marriage Ban had little effect *except* to express a particular religious viewpoint. When the Marriage Ban was passed, Puerto Rico’s existing statute expressly limited marriage to unions between a husband and wife. *See* P.R. LAWS ANN. tit. 31, § 221; *see also* *Conde-Vidal v. Garcia-Padilla*, No. 14-1253 (PG), 2014 WL 5361987, at *4 (D.P.R. Oct. 21, 2014) (detailing legislative history of Section 221 and noting that the Puerto Rico Code’s “long-standing” definition of marriage as between “a man and woman” had remained constant since its original enactment at the turn of the twentieth century). The impetus for Puerto Rico’s invidious law was the desire of certain individuals and religious organizations to affirmatively enshrine in the Commonwealth’s laws a particular religious understanding of marriage by not only explicitly barring same-sex couples from marrying in Puerto Rico but also refusing to recognize marriages legally entered elsewhere.

In the religious sphere, even among adherents of Christianity, there was (and continues to be) considerable debate about how religion should treat marriage between same-sex couples. The primary purpose of the law was to take sides in this religious debate by putting the full force of the Commonwealth behind an

express moral and religious condemnation of a vulnerable minority—gays and lesbians. *See supra* Section I.B. The restriction of marriage to opposite-sex couples was thus a quintessential governmental “endorsement” of religion—a misuse of governmental power to promote a particular religious view, with no legitimate secular purpose. The Marriage Ban is therefore unconstitutional under the Establishment Clause.

C. “Moral disapproval” does not render the Puerto Rico Marriage Ban rationally related to a legitimate state interest.

The Marriage Ban’s Establishment Clause deficiencies support the conclusion that the Marriage Ban violates the Equal Protection Clause. Morality and religion play an important role in the lives of many Americans, and many are undoubtedly guided in their voting by personal religious and moral beliefs.² But to be constitutional under the Supreme Court’s decisions in *Lawrence v. Texas*, 539 U.S. 558 (2003), *United States v. Windsor*, 133 S. Ct. 2675 (2013), and earlier cases, a law must be rationally related to a legitimate governmental interest beyond

² It should be noted that *amici* generally do not believe that homosexuality or marriage between same-sex couples is immoral. *See, e.g.*, Rev. Dr. C. Welton Gaddy, President, Interfaith Alliance, *Same-Gender Marriage & Religious Freedom: A Call to Quiet Conversations and Public Debates* (Aug. 2009), <http://www.interfaithalliance.org/equality/read>.

the desire to disadvantage a group on the basis of moral disapproval.³ The Puerto Rico Marriage Ban lacks any such legitimate purpose.

The Court held in *Lawrence* that “the fact that the governing majority in a State has traditionally viewed a particular practice as immoral is not a sufficient reason for upholding a law prohibiting the practice.” 539 U.S. at 577 (quoting *Bowers v. Hardwick*, 478 U.S. 186, 216 (1986) (Stevens, J., dissenting)) (internal quotation marks omitted). Justice O’Connor observed in her *Lawrence* concurrence that “[m]oral disapproval of [a particular group], like a bare desire to harm the group, is an interest that is insufficient to satisfy rational basis review under the Equal Protection Clause.” 539 U.S. at 582. Justice O’Connor further observed that the Court had “never held that moral disapproval, without any other asserted state interest, is a sufficient rationale under the Equal Protection Clause to justify a law that discriminates among groups of persons.” *Id.*

In *Windsor*, the Supreme Court found that Section 3 of the federal Defense of Marriage Act—by which Congress excluded married same-sex couples from

³ The majority opinion in *Lawrence* acknowledged the Equal Protection Clause theory as a “tenable argument,” but grounded its decision in principles of due process in order to eliminate any questions as to the continuing validity of *Bowers v. Hardwick*, 478 U.S. 186 (1986). See *Lawrence*, 539 U.S. at 574–75. In its due process analysis, the Court spoke not only of a protected liberty interest in the conduct prohibited by the Texas law—consensual sexual relations—but also of the Court’s concern with laws that “demean[]” gay people and “stigma[tize]” a group that deserves “respect.” *Id.* at 571–75; see also Nan D. Hunter, *Living with Lawrence*, 88 Minn. L. Rev. 1103, 1124 (2004).

over 1,100 federal rights, benefits, and obligations—had the purpose of expressing moral condemnation against gays and lesbians by demeaning the integrity of their relationships, as well as by expressing “animus” and a “bare . . . desire to harm a politically unpopular group.” 133 S. Ct. at 2693–95. The Court held this purpose unconstitutional based on the equal protection guarantees of the Fifth Amendment.

Id.

Lawrence and *Windsor* are just the latest cases where the Court invalidated laws reflecting a “bare . . . desire to harm a politically unpopular group.” See *Romer v. Evans*, 517 U.S. 620, 634–35 (1996) (alteration in original) (citation omitted) (finding constitutional amendment banning gays and lesbians from receiving nondiscrimination protections in any local jurisdiction was motivated by animus and moral disapproval, and therefore unconstitutional under the equal protection clause); *U.S. Dep’t of Agric. v. Moreno*, 413 U.S. 528, 534 (1973) (finding law targeting hippies unconstitutional under equal protection clause). In these cases, the Court properly stripped away the rationales proffered and concluded that “animus,” “negative attitudes,” “unease,” “fear,” bias,” or “unpopular[ity]” actually motivated the legislative actions at issue. *Windsor*, 133 S. Ct. at 2693–95; *Lawrence*, 539 U.S. at 582; *Romer*, 517 U.S. at 634–35; *Moreno*, 413 U.S. at 534.

Underlying these decisions is an awareness by the Supreme Court that allowing condemnation of a politically unpopular group to constitute a legitimate governmental interest would effectively eviscerate the equal protection guarantees of the Fifth and Fourteenth Amendments. Accordingly, the Supreme Court has consistently rejected moral condemnation as a governmental interest. *See also Loving v. Virginia*, 388 U.S. 1, 3 (1967) (striking down anti-miscegenation law after trial judge invoked God’s separation of the races); *Bostic v. Schaefer*, 760 F.3d 352, 380 (4th Cir.), *cert. denied*, 135 S. Ct. 308 (2014) (striking down a ban on marriage for same-sex couples and noting the “infirm[ity]” of any argument relying on the “interest of promoting moral principles . . . in light of *Lawrence*”).

This line of cases, which searches the record for moral condemnation of a group, is quite similar to Establishment Clause secular-purpose analysis. As discussed above, statements relating to the legislative efforts to pass the law demonstrate its purpose of preserving a particular religious “ideal” of marriage and condemning a type of marriage that does not fit that ideal. The law’s proponents were motivated by a desire to impose religious and moral condemnation on a minority, as in *Moreno* (hippies) and *Romer* (gay men and lesbians). The record is rife with statements that make clear that the “traditional marriage” the law was designed to protect was that envisioned by a particular lineage of Judeo-Christian

religious doctrine. This purpose is improper under both the Establishment Clause and the Equal Protection Clause.

There is no legitimate governmental interest that would justify a state's defining marriage to exclude same-sex couples. Numerous governmental interests have been proposed by the defenders of the Marriage Ban. But as the plaintiffs-appellants' brief explains, these professed interests are shams. What remains once these professed interests are rejected is clear from the record: a bare desire by the interest groups sponsoring the Marriage Ban to express their moral- and religion-based condemnation of gay and lesbian people. Under both the Establishment Clause and the Equal Protection Clause, the Marriage Ban is therefore unconstitutional.

II. The Court should abide by the constitutional tradition of strict separation between religious policy and state law.

A. Religious definitions of marriage vary, and a significant and growing number of religious groups and individuals support marriage equality.

Different religious groups have different views on marriage, and the separation of church and state guaranteed by the Constitution protects those views. In most religious communities, there is disagreement both among and within individual congregations regarding marriage. This diversity of belief is not new. Even within unified religious groups, restrictions on religious marriage have changed over time.

Many faith groups, such as the Catholic Church and the Church of Jesus Christ of Latter-day Saints, oppose marriage equality as part of their official doctrines. *See, e.g.,* The Congregation for the Doctrine of the Faith, *Considerations Regarding Proposals to Give Legal Recognition to Unions between Homosexual Persons* (2003); First Presidency and Council of the Twelve Apostles of the Church of Jesus Christ of Latter-Day Saints, *The Family: A Proclamation to the World* (1995).

Other faiths openly welcome same-sex couples into marriage, including many of the undersigned *amici*.⁴ The United Church of Christ and the Unitarian Universalist Association officially support marriage equality, as do several Jewish denominations—the Reform, Conservative, Reconstructionist, and Humanistic Movements.⁵ Some faiths allow individual congregations to decide whether to

⁴ The fact that some religious groups welcome marriage between same-sex couples does not demonstrate that gay and lesbian individuals have “political power” as that term is used in the context of Equal Protection scrutiny. *See Kerrigan v. Comm’r of Pub. Health*, 957 A.2d 407, 439–54 (Conn. 2008), for full treatment of this issue. In any case, many religious groups historically have been—and apparently continue to be—strong opponents of equal marriage rights for same-sex couples.

⁵ *See, e.g.,* Shaila Dewan, *United Church of Christ Backs Same-Sex Marriage*, N.Y. Times, July 5, 2005; Unitarian Universalist Assoc., *Unitarian Universalists Support Freedom to Marry!*, <http://www.uua.org/beliefs/justice/128897.shtml> (last updated May 2, 2011); Rabbi Elliot Dorff et al., Rabbinical Assembly, *Rituals and Documents of Marriage and Divorce for Same-Sex Couples* (Spring 2012), available at <http://www.rabbinicalassembly.org/sites/default/files/public/halakhah/teshuvot/2011-2020/same-sex-marriage-and-divorce-appendix.pdf>; Gen. Assembly of the Union of Am. Hebrew Congregations, *Civil Marriage for Gay and Lesbian*

bless marriages between same-sex couples. Last year, for example, the Episcopal National Cathedral in Washington, D.C. endorsed such marriages. Laurie Goodstein, *Washington National Cathedral Announces It Will Hold Same-Sex Weddings*, N.Y. Times, Jan. 9, 2013, at A12 (noting that Episcopal National Convention authorized official liturgy for blessing same-sex unions).

Further, even in faiths where there is no official recognition of marriage between same-sex couples, many members maintain their faith while still supporting equal marriage. A recent poll found that 63 percent of religious non-Christians, 56 percent of white Catholics, 53 percent of Hispanic Catholics, and 52 percent of white mainline Protestants favored allowing same-sex couples to marry. Robert P. Jones, Pub. Religion Research Inst., *Religious Americans' Perspectives on Same-Sex Marriage* (June 30, 2012), <http://publicreligion.org/2012/06/fortnight-of-facts-religious-americans-perspectives-on-same-sex-marriage/>.

While many religious institutions may have a history of defining marriage as between a man and a woman, those traditions are separate from, and cannot be allowed to dictate, civil law. The legal definition of civil marriage should not be tied to particular religious traditions, but should instead reflect a broad, inclusive institution designed to protect the fundamental rights of all members of our secular,

Jewish Couples (Nov. 2, 1997), http://urj.org//about/union/governance/reso//?syspage=article&item_id=2000; Soc'y for Humanistic Judaism, *Society for Humanistic Judaism Supports Marriage Rights of Same-Sex Couples* (Apr. 2004), <http://www.shj.org/humanistic-jewish-life/issues-and-resolutions/marriage-equality>.

constitutional republic. Although a religious group cannot be forced to open its doors or its sacraments to those who disagree with its traditions, neither can the government restrict access to the secular institution of civil marriage to align with particular, restrictive religious beliefs.

B. Civil and religious marriage are distinct, a tradition that religious groups on all sides of this debate recognize and value.

Under our constitutional scheme, religious groups have a fundamental right to adopt and modify requirements for marriage within their own religious communities. But they do not have the right to impose their particular religious views onto the institution of civil marriage. “Some religious organizations prohibit or discourage interfaith and interracial marriage, but it would obviously not be constitutional for a state to do so.” *Latta v. Otter*, 771 F.3d 456, 475 n.17 (9th Cir. Oct. 7, 2014).

Many religious groups have historically recognized the benefit inherent in ensuring that their own rules on marriage are distinct from those embodied in civil law: autonomy to determine which marriages to solemnize and under what circumstances. A number of religious groups that now support ingrain their religious understanding of marriage into Puerto Rico law forget their own traditions of supporting—and benefitting from—separation between church policy and state law. *See, e.g.,* Southern Baptist Convention, *Position Statement on Church and State*, <http://www.sbc.net/aboutus/positionstatements.asp> (last visited

July 2, 2014) (“We stand for a free church in a free state. Neither one should control the affairs of the other.”); Joseph F. Smith et al., *Presentation of the First Presidency to the April 1896 Conference of the Church of Jesus Christ of Latter Day Saints*, reprinted in U.S. Congress, *Testimony of Important Witnesses as Given in the Proceedings Before the Committee on Privileges and Elections of the United States Senate in the Matter of the Protest Against the Right of Hon. Reed Smoot, A Senator from the State of Utah, to Hold His Seat* 106 (1905) (Church leadership, in defending a U.S. Senator against charges his Mormon faith made him ineligible to serve, wrote: “[T]here has not been, nor is there, the remotest desire on our part, or on the part of our coreligionists, to do anything looking to a union of church and state.”); cf. *Illinois ex rel. McCollum v. Bd. of Educ.*, 333 U.S. 203, 212 (1948) (“[T]he First Amendment rests upon the premise that both religion and government can best work to achieve their lofty aims if each is left free from the other within its respective sphere.”).

A review of practices surrounding interfaith, interracial, and post-divorce marriage illustrates the diversity of religious views of marriage and the tradition of separating such views from civil law.

Interfaith Marriage: Some churches historically prohibited (and some continue to prohibit) interfaith marriage, while others accept it. For example, the Roman Catholic Church’s *Code of Canon Law* proscribed interfaith marriage for

most of the twentieth century. Michael G. Lawler, *Marriage and the Catholic Church: Disputed Questions* 118–19 (2002) (quoting 1917 Code C.1060). Although this restriction was relaxed in 1983, modern Catholic doctrine still requires the Church’s “express permission” to marry a non-Catholic Christian and “express dispensation” to marry a non-Christian. 1983 Code C.1086, 1124; Roman Catholic Church, *Catechism of the Catholic Church* 1635 (1995 ed.). Similarly, Orthodox and Conservative Jewish traditions both tend to proscribe interfaith marriage, see David S. Ariel, *What Do Jews Believe?: The Spiritual Foundations of Judaism* 129 (1996), as do many interpretations of Islamic law, see *Bandari v. INS*, 227 F.3d 1160, 1163–64 (9th Cir. 2000) (Iran’s official interpretation of Islamic law forbids interfaith marriage and dating).

Despite these religious traditions prohibiting or limiting interfaith marriage, American civil law has not restricted or limited marriage to couples of the same faith, and doing so would be patently unconstitutional. See *Epperson v. Arkansas*, 393 U.S. 97, 104 (1968) (“The First Amendment mandates governmental neutrality between religion and religion, and between religion and nonreligion.”); cf. *Bandari*, 227 F.3d at 1168 (“[P]ersecution aimed at stamping out an interfaith marriage is without question persecution on account of religion.”) (citation and internal quotation marks omitted).

Interracial Marriage: As with interfaith marriage, religious institutions in the past have differed markedly in their treatment of interracial relationships. For example, some fundamentalist churches previously condemned interracial marriage. *See Bob Jones Univ. v. United States*, 461 U.S. 574, 580–81 (1983) (fundamentalist Christian university believed that “the Bible forbids interracial dating and marriage”).

In the past, the Church of Jesus Christ of Latter-day Saints discouraged interracial marriage. *See Interracial Marriage Discouraged*, Church News, June 17, 1978, at 2 (“Now, the brethren feel that it is not the wisest thing to cross racial lines in dating and marrying.”) (quoting President Spencer W. Kimball in a 1965 address to students at Brigham Young University). Yet, in the context of its policy on excluding African-Americans from the priesthood, the Church expressly recognized that its position on treatment of African-Americans was “wholly within the category of religion,” applying only to those who joined the church, with “no bearing upon matters of civil rights.” The First Presidency, *Statement on the Status of Blacks*, Dec. 15, 1969, reproduced in Appendix, *Neither White Nor Black: Mormon Scholars Confront the Race Issue in a Universal Church* (Lester E. Bush, Jr. & Armand L. Mauss eds., 1984). Similarly, religious views regarding interracial marriage must not dictate the terms of civil marriage.

Marriage Following Divorce: Finally, the Catholic Church does not recognize marriages of those who divorce and remarry, viewing those marriages as “objectively contraven[ing] God’s law.” *Catechism of the Catholic Church* 1650, 2384. However, civil law has not reflected this position, and passing a law that did so would interfere with the fundamental right to marry. *See Boddie v. Connecticut*, 401 U.S. 371, 376 (1971).

* * *

In all three instances discussed above, individual religious groups have adopted particular rules relating to marriage, yet those rules do not dictate the contours of civil marriage law. At the same time, the religious groups that have followed those rules have been able to enforce them internally, due to our country’s long tradition of separation between church and state. For some of these religious groups to now advocate for a religion-based understanding of marriage to be imposed on all people throughout the Commonwealth smacks of a hypocritical double standard.

III. A decision invalidating the Puerto Rico Marriage Ban would not threaten religious liberty.

A. The Puerto Rico Marriage Ban denies, rather than protects, religious liberty.

In past cases, such as the one challenging California’s Proposition 8, opponents of marriage equality have claimed that excluding same-sex couples

from marriage could be grounded in a legitimate governmental interest in promoting religious liberty. As in those cases, no one's religious liberty would be threatened by overturning the Puerto Rico Marriage Ban. The First Amendment protects the right of religious groups and their adherents to make their own rules regarding the religious solemnization of marriages. The legalization of marriage for same-sex couples would leave "religious institutions . . . as free as they have always been to practice their sacraments and traditions as they see fit." *Kitchen v. Herbert*, 755 F.3d 1193, 1227 (10th Cir.), *cert. denied*, 135 S. Ct. 265 (2014) (affirming unconstitutionality of Utah marriage ban). In the United States, civil marriage is a separate institution, and it does not mirror the requirements of religious marriage. If anything, by adopting sectarian religious doctrine to restrict marriage, the Marriage Ban burdens the religious liberty of those whose faith traditions welcome same-sex couples to enter legal marriages in religious ceremonies. Despite going through a ceremony and commitment like their religious brethren (albeit without state solemnization), same-sex couples face exclusion from the separate, parallel civil institution.

Proponents of marriage bans have argued that if same-sex couples could marry, churches, private businesses, public schools, teachers, and counselors (among others) would see their religious freedoms curtailed, face discrimination lawsuits, and risk losing governmental benefits. This parade of horrors is

misplaced and misunderstands the purpose and meaning of “religious liberty.” These arguments only serve to highlight that proponents of the Marriage Ban have selected one particular religious understanding of marriage as deserving of “religious liberty” protection—a religious preference that violates the Establishment Clause.

Civil marriage in the United States must be—and always has been prior to now—blind to religious doctrine. Atheists have a right to civil marriage, as tests of faith for public rights are unconstitutional. *See Torcaso v. Watkins*, 367 U.S. 488, 496–97 (1961) (holding unconstitutional a belief-in-God test for holding public office). The fact that atheists enjoy the same legal right to civil marriage as religious people poses no threat to religious marriage traditions, nor does it cheapen or abrogate the institution of marriage. And as discussed above, civil marriage’s inclusion of biracial couples, couples of different faiths, and couples with prior divorces has long been the norm, and at no point has this “open tent” approach impinged on religious liberty. Churches have continued to practice their marriage rituals without facing legal liability for refusing to consecrate certain kinds of marriages and without losing their tax-exempt status.

B. A decision overturning the Marriage Ban would not result in a flood of discrimination lawsuits against religious people.

1. *Marriage equality is a separate and distinct issue from anti-discrimination laws.*

In past marriage cases, parties and *amici* defending marriage bans have expressed concern that allowing marriage equality would cause a flood of lawsuits alleging discrimination on the basis of sexual orientation against religious people—particularly wedding vendors like florists and photographers. But these arguments are a red herring: cities and municipalities in Puerto Rico already bar anti-gay discrimination. Those who make such arguments actually take issue with the anti-discrimination law and the government’s decision to provide anti-discrimination protection with respect to public accommodations, not with the legal definition of marriage. As the Ninth Circuit recently wrote:

Whether a Catholic hospital must provide the same health care benefits to its employees’ same-sex spouses as it does their opposite-sex spouses, and whether a baker is civilly liable for refusing to make a cake for a same-sex wedding, turn on state public accommodations law, federal anti-discrimination law, and the protections of the First Amendment. These questions are not before us.

Latta, 771 F.3d at 475; *see also Kitchen*, 755 F.3d at 1228 n.13 (“[S]uch lawsuits would be a function of anti-discrimination law, not legal recognition of same-sex marriage.”).

Additionally, the vendors supposedly at risk of facing sexual-orientation discrimination lawsuits would not be newly exposed to litigation by invalidation of Puerto Rico’s Marriage Ban, because same-sex couples *already* have unofficial religious and non-religious marriage ceremonies throughout the Commonwealth.

Unofficial or not, wedding vendors have been—and will continue to be—subject to nondiscrimination laws for these kinds of ceremonies. Making the ceremonies official marriage ceremonies—while important for the married couple—will make no difference whatsoever to any vendor’s pre-existing obligation to comply with nondiscrimination laws.

2. *Commercial businesses have no constitutional right to discriminate.*

A business that avails itself of the benefits of doing business with the public must be subject to the public’s rules for conducting that business. “The Constitution does not guarantee a right to choose employees, customers, suppliers, or those with whom one engages in simple commercial transactions, without restraint from the State.” *Roberts v. U.S. Jaycees*, 468 U.S. 609, 634 (1984) (O’Connor, J., concurring). Indeed, it is a fundamental principle of public accommodations law that when a business chooses to solicit customers from the general public, it relinquishes autonomy over whom to serve. *Bell v. Maryland*, 378 U.S. 226, 314–15 (1964) (Goldberg, J., concurring) (quoting *Marsh v. Alabama*, 326 U.S. 501, 506 (1946)). As the Supreme Court of Nebraska explained in one of the earliest public accommodation decisions, “a barber, by opening a shop, and putting out his sign, thereby invites every orderly and well-behaved person who may desire his services to enter his shop during business hours. The statute will not permit him to say to one: ‘You are a slave, or a son of a

slave; therefore I will not shave you.” *Messenger v. State*, 41 N.W. 638, 639 (Neb. 1889).

In short, to the extent the law requires it, “one who employ[s] his private property for purposes of commercial gain by offering goods or services to the public must stick to his bargain.” *Heart of Atlanta Motel, Inc. v. United States*, 379 U.S. 241, 284 (1964) (Douglas, J., concurring) (quoting S. Rep. No. 872, 88th Cong., 2d Sess., 22). Puerto Rico has elected to apply this principle to protect same-sex couples, and will continue to do so whether or not marriage equality is the law. Excluding same-sex couples from marriage simply to foreclose potentially meritorious discrimination claims against a commercial business is not a legitimate governmental interest.

CONCLUSION

For the foregoing reasons, the judgment of the Puerto Rico district court should be reversed.

Respectfully submitted,

This 2nd day of February 2015

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**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATION,
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This brief complies with the type-volume limitation of Fed. R. App. P. 32(a)(7)(B) and 29(b) because it contains 6,998 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(a)(7)(B)(iii).

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February 2, 2015

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the First Circuit by using the appellate CM/ECF system on February 2, 2015.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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Case No. 14-2184

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

ADA MERCEDES CONDE-VIDAL, *et al.*,
Plaintiffs-Appellants,

v.

DR. ANA RIUS-ARMENDARIZ, in her official capacity as Secretary of the
Health Department of Puerto Rico, *et al.*,
Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO, THE HON. JUAN M. PÉREZ-GIMÉNEZ PRESIDING,
CASE No. 3:14-cv-01253-PG

**APPENDIX A TO BRIEF OF *AMICI CURIAE* ANTI-DEFAMATION
LEAGUE · AMERICANS UNITED FOR SEPARATION OF CHURCH AND
STATE · BEND THE ARC: A JEWISH PARTNERSHIP FOR JUSTICE ·
CENTRAL CONFERENCE OF AMERICAN RABBIS · GLOBAL
JUSTICE INSTITUTE · HADASSAH, THE WOMEN'S ZIONIST
ORGANIZATION OF AMERICA · THE HINDU AMERICAN
FOUNDATION · INTERFAITH ALLIANCE FOUNDATION · THE
JAPANESE AMERICAN CITIZENS LEAGUE · JEWISH SOCIAL
POLICY ACTION NETWORK · KESHET · METROPOLITAN
COMMUNITY CHURCHES · MORE LIGHT PRESBYTERIANS · THE
NATIONAL COUNCIL OF JEWISH WOMEN · NEHIRIM · PEOPLE FOR
THE AMERICAN WAY FOUNDATION · PRESBYTERIAN WELCOME ·
RECONCILINGWORKS: LUTHERANS FOR FULL PARTICIPATION ·
RECONSTRUCTIONIST RABBINICAL COLLEGE AND JEWISH
RECONSTRUCTIONIST COMMUNITIES · RELIGIOUS INSTITUTE,
INC. · SIKH AMERICAN LEGAL DEFENSE AND EDUCATION FUND ·
SOCIETY FOR HUMANISTIC JUDAISM · T'RUAH: THE RABBINIC
CALL FOR HUMAN RIGHTS · WOMEN OF REFORM JUDAISM · AND
WOMEN'S LEAGUE FOR CONSERVATIVE JUDAISM ·
IN SUPPORT OF APPELLANTS AND SUPPORTING REVERSAL**

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APPENDIX

Amicus curiae Anti-Defamation League (ADL) was founded in 1913 to combat anti-Semitism and other forms of discrimination, to advance goodwill and mutual understanding among Americans of all creeds and races, and to secure justice and fair treatment to all. Today, ADL is one of the world's leading civil and human rights organizations combating anti-Semitism and all types of prejudice, discriminatory treatment, and hate. As part of its commitment to protecting the civil rights of all persons, ADL has filed amicus briefs in numerous cases urging the unconstitutionality or illegality of discriminatory practices or laws, including *Hosanna-Tabor Evangelical Lutheran Church and School v. E.E.O.C.*, 132 S. Ct. 694 (2012); *Christian Legal Society v. Martinez*, 130 S. Ct. 2971 (2010); *Lawrence v. Texas*, 539 U.S. 558 (2003); *Zelman v. Simmons-Harris*, 536 U.S. 639 (2002); *Alexander v. Sandoval*, 532 U.S. 275 (2001); *Boy Scouts of America v. Dale*, 530 US 640 (2000); *Mitchell v. Helms*, 530 U.S. 793 (2000); and *Romer v. Evans*, 517 U.S. 620 (1996). ADL has a substantial interest in this case. At issue are core questions about equality and constitutional rights. And the justifications offered by Petitioners and their *amici*—if embraced by this Court—would invite state-sanctioned prejudice of the strain that ADL has long fought.

Amicus curiae Americans United for Separation of Church and State is a national, nonsectarian public-interest organization based in Washington, D.C. Its

mission is twofold: (1) to advance the free-exercise rights of individuals and religious communities to worship as they see fit, and (2) to preserve the separation of church and state as a vital component of democratic government. Americans United was founded in 1947 and has more than 120,000 members and supporters across the country.

Americans United has long supported laws that reasonably accommodate religious practice. *See, e.g.*, Brief for Americans United for Separation of Church and State et al., as Amici Curiae Supporting Respondents, *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418 (2006), 2005 WL 2237539 (supporting exemption from federal drug laws for Native American religious practitioners); Brief for Americans United for Separation of Church and State and American Civil Liberties Union as Amici Curiae Supporting Petitioners, *Cutter v. Wilkinson*, 544 U.S. 709 (2005), 2004 WL 2945402 (supporting religious accommodations for prisoners). Consistently with its support for the separation of church and state, however, Americans United opposes measures that exceed the bounds of permissible accommodation by imposing substantial harms on innocent third parties. That concern is especially salient when the purported accommodation results in government-sanctioned discrimination against a class of people that historically has been the target of religious and moral disapproval.

Amicus curiae Bend the Arc: A Jewish Partnership for Justice, is a national organization inspired by Jewish values and the steadfast belief that Jewish Americans, regardless of religious or institutional affiliations, are compelled to create justice and opportunity for Americans.

Amici curiae the Central Conference of American Rabbis (CCAR), whose membership includes more than 2,000 Reform rabbis, and the Women of Reform Judaism, which represents more than 65,000 women in nearly 500 women's groups in North America and around the world, oppose discrimination against all individuals, including gays and lesbians, for the stamp of the Divine is present in each and every human being. As Jews, we are taught in the very beginning of the Torah that God created humans B'tselem Elohim, in the Divine Image, and therefore the diversity of creation represents the vastness of the Eternal (Genesis 1:27). Thus, we unequivocally support equal rights for all people, including the right to a civil marriage license. Furthermore, we whole-heartedly reject the notion that the state should discriminate against gays and lesbians with regard to civil marriage equality out of deference to religious tradition, as Reform Judaism celebrates the unions of loving same-sex couples and considers such partnerships worthy of blessing through Jewish ritual.

Amicus curiae the Global Justice Institute is the social justice arm of Metropolitan Community Churches. We are separately incorporated, though we

originally began as a "ministry" of MCC. We are working in Asia, Pakistan, Eastern Europe, Latin America, the Caribbean, Canada, the United States, East Africa and South Africa on matters of social justice and public policy primarily in the LGBTI communities, but also along lines of intersection with other marginalized communities.

Amicus curiae Hadassah, The Women's Zionist Organization of America, founded in 1912, has over 330,000 Members, Associates, and supporters nationwide. In addition to Hadassah's mission of initiating and supporting pace-setting health care, education, and youth institutions in Israel, Hadassah has a proud history of protecting the rights of women and the Jewish community in the United States. Hadassah vigorously condemns discrimination of any kind and, as a pillar of the Jewish community, understands the dangers of bigotry. Hadassah strongly supports the constitutional guarantees of religious liberty and equal protection, and rejects discrimination on the basis of sexual orientation. Hadassah supports government action that provides civil status to committed same-sex couples and their families equal to the civil status provided to the committed relationships of men and women and their families, with all associated legal rights and obligations, both federal and state.

Amicus curiae Hindu American Foundation (HAF) is an advocacy organization for the Hindu American community. The Foundation educates the

public about Hinduism, speaks out about issues affecting Hindus worldwide, and builds bridges with institutions and individuals whose work aligns with HAF's objectives. HAF focuses on human and civil rights, public policy, media, academia, and interfaith relations. Through its advocacy efforts, HAF seeks to cultivate leaders and empower future generations of Hindu Americans.

Since its inception, the Hindu American Foundation has made legal advocacy one of its main areas of focus. From issues of religious accommodation, religious discrimination, and hate crimes to defending fundamental constitutional rights of free exercise and the separation of church and state, HAF has educated Americans at large and the courts about various aspects of Hinduism and issues impacting the Hindu American community, either as a party to the case or an *amicus curiae*.

Amicus curiae Interfaith Alliance Foundation celebrates religious freedom by championing individual rights, promoting policies that protect both religion and democracy, and uniting diverse voices to challenge extremism. Founded in 1994, Interfaith Alliance's members across the country belong to 75 different faith traditions as well as no faith tradition. Interfaith Alliance supports people who believe their religious freedoms have been violated as a vital part of its work promoting and protecting a pluralistic democracy and advocating for the proper boundaries between religion and government. Interfaith Alliance also seeks to shift

the perspective on LGBT equality from that of problem to solution, from a scriptural argument to a religious freedom agreement, and to address the issue of equality as informed by our Constitution. Same-Gender Marriage and Religious Freedom: A Call to Quiet Conversations and Public Debates, a paper by Interfaith Alliance President, Rev. Dr. C. Welton Gaddy, offers a diversity of ideas based on Interfaith Alliance's unique advocacy for religious freedom and interfaith exchange.

Amicus curiae Japanese American Citizens League, founded in 1929, is the nation's largest and oldest Asian-American non-profit, non-partisan organization committed to upholding the civil rights of Americans of Japanese ancestry and others. It vigilantly strives to uphold the human and civil rights of all persons. Since its inception, JACL has opposed the denial of equal protection of the laws to minority groups. In 1967, JACL filed an amicus brief in *Loving v. Virginia*, urging the Supreme Court to strike down Virginia's anti-miscegenation laws, and contending that marriage is a basic civil right of all persons. In 1994, JACL became the first API non-gay national civil rights organization, after the American Civil Liberties Union, to support marriage equality for same-sex couples, affirming marriage as a fundamental human right that should not be barred to same-sex couples. JACL continues to work actively to safeguard the civil rights of all Americans.

Amicus curiae Jewish Social Policy Action Network (JSPAN) is a membership organization of American Jews dedicated to protecting the Constitutional liberties and civil rights of Jews, other minorities, and the vulnerable in our society. For most of the last two thousand years, whether they lived in Christian or Muslim societies, Jews were a small religious minority victimized by prejudice and lacking sufficient political power to protect their rights.^[1] During the Holocaust, not only Jews, but gays and lesbians, Gypsies and others were targeted for persecution and death at the hands of the Nazis. Perhaps because of their shared history as victimized outsiders, Jews have been especially sensitive to the plight of the lesbian and gay community as a discrete and insular minority within American society and throughout much of the world. As one of many voices within the progressive Jewish community, JSPAN is committed to making marriage under civil law available to consenting couples without regard to their sexual orientation.

Amicus curiae Keshet is a national organization that works for the full equality and inclusion of lesbian, gay, bisexual, and transgender (LGBT) Jews in

^[1] Even in the United States, Jews have been subjected to various forms of discrimination—formally such as in the requirements to hold public office (*see, e.g.,* Hartogensis, *Denial Of Equal Rights To Religious Minorities And Non-Believers In The United States* (1930) 39 Yale L.J. 659), or informally such as through quotas in higher education, particularly medical and legal education (*see, e.g.,* Halperin, *The Jewish Problem in U.S. Medical Education: 1920-1955* (2001) 56 J. Hist. Med. & Allied Sci. 140; Nelson, *The Changing Meaning of Equality in Twentieth-Century Constitutional Law* (1995) 52 Wash. & Lee L.Rev. 3, 35).

Jewish life. Led and supported by LGBT Jews and straight allies, Keshet cultivates the spirit and practice of inclusion in all parts of the Jewish community. Keshet is the only organization in the U.S. that works for LGBT inclusion in all facets of Jewish life – synagogues, Hebrew schools, day schools, youth groups, summer camps, social service organizations, and other communal agencies. Through training, community organizing, and resource development, we partner with clergy, educators, and volunteers to equip them with the tools and knowledge they need to be effective agents of change.

Amicus curiae Metropolitan Community Churches (MCC) was founded in 1968 to combat the rejection of and discrimination against persons within religious life based upon their sexual orientation or gender identity. MCC has been at the vanguard of civil and human rights movements and addresses the important issues of racism, sexism, homophobia, ageism, and other forms of oppression. MCC is a movement that faithfully proclaims God’s inclusive love for all people and proudly bears witness to the holy integration of spirituality and sexuality.

Amicus curiae More Light Presbyterians represents lesbian, gay, bisexual, and transgender people in the life, ministry, and witness of the Presbyterian Church (U.S.A.) and in society.

Amicus curiae National Council of Jewish Women (NCJW) is a grassroots organization of 90,000 volunteers and advocates who turn progressive ideals into

action. Inspired by Jewish values, NCJW strives for social justice by improving the quality of life for women, children, and families and by safeguarding individual rights and freedoms. NCJW's Resolutions state that NCJW resolves to work for "Laws and policies that provide equal rights for same-sex couples." Our principles state that "Religious liberty and the separation of religion and state are constitutional principles that must be protected and preserved in order to maintain our democratic society" and "discrimination on the basis of race, gender, national origin, ethnicity, religion, age, disability, marital status, sexual orientation, or gender identity must be eliminated." Consistent with our Principles and Resolutions, NCJW joins this brief.

Amicus curiae Nehirim is a national community of lesbian, gay, bisexual, and transgender (LGBT) Jews, partners, and allies. Nehirim's advocacy work centers on building a more just and inclusive world based on the teachings in the Jewish tradition.

Amicus curiae People For the American Way Foundation (PFAWF), a nonpartisan citizens' organization established to promote and protect civil and constitutional rights, joins this brief on behalf of its members and activists in the Commonwealth of Puerto Rico. Founded in 1981 by a group of religious, civic, and educational leaders devoted to our nation's heritage of tolerance, pluralism, and liberty, PFAWF has been actively involved in litigation and other efforts

nationwide to combat discrimination and promote equal rights, including efforts to protect and advance the civil rights of LGBT individuals. PFAWF regularly participates in civil rights litigation, and has supported litigation to secure the right of same-sex couples to marry. PFAWF joins this brief in order to vindicate the constitutional right of same-sex couples to equal protection of the law.

Amicus curiae Presbyterian Welcome is a non-profit corporation organized under the laws of the State of New York and headquartered in New York City. It has no parent corporation and issues no stock.

Amicus curiae ReconcilingWorks: Lutherans For Full Participation organizes lesbian, gay, bisexual, and transgender individuals and their allies within the Lutheran communion and its ecumenical and global partners.

Amicus curiae Reconstructionist Rabbinical College and Jewish Reconstructionist Communities educates leaders, advances scholarship, and develops resources for contemporary Jewish life.

Amicus curiae Religious Institute, Inc. is a multifaith organization whose thousands of supporters include clergy and other religious leaders from more than fifty faith traditions. The Religious Institute, Inc. partners with the leading mainstream and progressive religious institutions in the United States.

Amicus curiae the Sikh American Legal Defense and Education Fund (SALDEF) was founded in 1996 and is the oldest Sikh American civil rights and

educational organization. We empower Sikh Americans through advocacy, education, and media relations. SALDEF's mission is to protect the civil rights of Sikh Americans and ensure a fostering environment in the United States for future generations.

Amicus curiae Society for Humanistic Judaism (SHJ) mobilizes people to celebrate Jewish identity and culture, consistent with Humanistic ethics and a nontheistic philosophy of life. Humanistic Jews believe each person has a responsibility for their own behavior, and for the state of the world, independent of any supernatural authority. The SHJ is concerned with protecting religious freedom for all, and especially for religious, ethnic, and cultural minorities such as Jews, and most especially for Humanistic Jews, who do not espouse a traditional religious belief. Humanistic Jews support the right and responsibility of adults to choose their marriage partners, and Humanistic rabbis perform marriages in Puerto Rico. The Society for Humanistic Judaism supports the legal recognition of marriage and divorce between adults of the same sex, and affirms the value of marriage between any two committed adults with the sense of obligations, responsibilities, and consequences thereof.

Amicus curiae T'ruah: The Rabbinic Call for Human Rights is an organization led by rabbis from all denominations of Judaism that acts on the Jewish imperative to respect and protect the human rights of all people. Our

commitment to human rights begins with the Torah's declaration that all people are created in the image of God (Genesis 1:26). Within the Jewish canon, this core belief leads to teachings that equate harming a human being with diminishing the image of God. (See, for example, B'reishit Rabbah 34:14 and Mishnah Sanhedrin 6:5.) People of faith are not of one mind opposing civil marriage equality, and many interpretations of religion, including ours, support equal marriage rights. Judaism insists on the equality of every person before the law. The Torah instructs judges, "You shall not judge unfairly; you shall show no partiality" (Deuteronomy 16:19). Jewish law has developed strict guidelines to ensure that courts function according to this principle. The rights and protections afforded by civil marriage are legal and not religious in nature. The case at hand addresses tax obligations that may be incumbent on some couples married according to the laws of their state, but not on others. Jewish law accepts that "the law of the land is the law," and upholds the right of the government to impose taxes on its citizens. However, major Jewish legal authorities classify as "theft" a tax levied on one subgroup and not on another (Maimonides, Mishneh Torah, Laws of Theft 5:14; Shulchan Aruch, Hoshen Mishpat 369:8). We thus believe it is important to state that people of faith are not of one mind opposing civil marriage equality, and that many interpretations of religion actually support such equality. The Universal Declaration of Human Rights similarly guarantees to every person equal rights, without "distinction of

any kind,” and specifies that “Men and women of full age * * * are entitled to equal rights as to marriage, during marriage and at its dissolution.” While each rabbi or religious community must retain the right to determine acceptable guidelines for religious marriage, the state has an obligation to guarantee to same-sex couples the legal rights and protections that accompany civil marriage. Doing otherwise constitutes a violation of human rights, as well as the Jewish and American legal imperatives for equal protection under the law.

Amicus curiae, Women's League for Conservative Judaism (WLCJ) is the largest synagogue based women's organization in the world. As an active arm of the Conservative/Masorti movement, we provide service to hundreds of affiliated women's groups in synagogues across North America and to thousands of women worldwide. WLCJ strongly supports full civil equality for gays and lesbians with all associated legal rights and obligations, both federal and state and rejects discrimination on the basis of sexual orientation.

Case No. 14-2184

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

ADA MERCEDES CONDE-VIDAL, *et al.*,
Plaintiffs-Appellants,

v.

DR. ANA RIUS-ARMENDARIZ, in her official capacity as Secretary of the
Health Department of Puerto Rico, *et al.*,
Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO, THE HON. JUAN M. PÉREZ-GIMÉNEZ PRESIDING,
CASE No. 3:14-cv-01253-PG

**APPENDIX B TO BRIEF OF *AMICI CURIAE* ANTI-DEFAMATION
LEAGUE · AMERICANS UNITED FOR SEPARATION OF CHURCH AND
STATE · BEND THE ARC: A JEWISH PARTNERSHIP FOR
JUSTICE · CENTRAL CONFERENCE OF AMERICAN
RABBIS · GLOBAL JUSTICE INSTITUTE · HADASSAH, THE WOMEN'S
ZIONIST ORGANIZATION OF AMERICA · THE HINDU AMERICAN
FOUNDATION · INTERFAITH ALLIANCE FOUNDATION · THE
JAPANESE AMERICAN CITIZENS LEAGUE · JEWISH SOCIAL
POLICY ACTION NETWORK · KESHET · METROPOLITAN
COMMUNITY CHURCHES · MORE LIGHT PRESBYTERIANS · THE
NATIONAL COUNCIL OF JEWISH WOMEN · NEHIRIM · PEOPLE FOR
THE AMERICAN WAY FOUNDATION · PRESBYTERIAN
WELCOME · RECONCILINGWORKS: LUTHERANS FOR FULL
PARTICIPATION · RECONSTRUCTIONIST RABBINICAL COLLEGE
AND JEWISH RECONSTRUCTIONIST COMMUNITIES · RELIGIOUS
INSTITUTE, INC. · SIKH AMERICAN LEGAL DEFENSE AND
EDUCATION FUND · SOCIETY FOR HUMANISTIC JUDAISM · T'RUAH:
THE RABBINIC CALL FOR HUMAN RIGHTS · WOMEN OF REFORM
JUDAISM · AND WOMEN'S LEAGUE FOR CONSERVATIVE JUDAISM ·
IN SUPPORT OF APPELLANTS AND SUPPORTING REVERSAL**

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Lun, 2 de febrero de 2015

PORTADA

ELNUEVODIA.COM

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CERO NUPCIAS ENTRE HOMOSEXUALES

dom, 9 de febrero de 1997
EL NUEVO DIA /

Cambio en la lectura



LETRA



COLUMNAS



INICIAL

PUBLICIDAD

Por JUANITA COLOMBANI ESPECIAL PARA EL NUEVO DIA LOS REPRESENTANTES novoprogresistas Epifanio Jimenez y Carlos Diaz accedieron a una peticon de dos grupos moralistas y del evangelista Jorge Rascke y presentaron un proyecto de ley que prohíbe claramente el matrimonio entre personas del mismo sexo.

En el Código Civil de Puerto Rico esta implícito que el matrimonio solo puede llevarse a cabo entre hombres y mujeres. Pero, la medida se anticipa a un caso pendiente de adjudicación en la Corte Suprema de los Estados Unidos, que tiene ante sí un caso de Hawai, donde en 1993, el Tribunal Supremo de este estado concluyó que prohibir los matrimonios entre personas del mismo sexo podía ser discriminatorio.

Aquí, el Código Civil dispone que el matrimonio "es una institución civil que procede de un contrato civil en virtud del cual un hombre y una mujer se obligan mutuamente a ser esposo y esposa..."

La medida fue presentada el viernes pasado y dada a conocer ayer por el reverendo Rascke en la conferencia de prensa previa a su presentación en la edición número 23 del acto religioso Clamor a Dios, que se hace cada año durante el feriado del Día del Trabajo para evangelizar y recaudar fondos para el ministerio del mismo nombre.

CONTRARIO a ocasiones anteriores -como el año pasado que fue uno electoral- la presencia de políticos fue escasa. Rascke dijo que el gobernador Pedro Rossello y la alcaldesa de San Juan, Sila Calderon, le comunicaron personalmente que no podrían asistir. La cantidad de público tampoco se asemeja a la de años anteriores. El tránsito en las cercanías del Capitolio estuvo liviano incluso a minutos de que comenzara el mensaje de Rascke.

No obstante, la secretaria de Estado, Norma Burgos, asistió al acto en calidad de gobernadora Interina y pronunció un mensaje corto.

Sobre el proyecto, Rascke explicó que propone añadir un nuevo artículo al Código Civil de Puerto Rico. Indico que la medida fue cabildeada por el grupo antiabortista Pro Vida y la organización Morality in Media.

Para justificar sus propósitos, Rascke dijo si el Tribunal Supremo de los Estados Unidos confirma el dictamen de Hawai, se podría obligar aquí a ministros y sacerdotes a realizar matrimonios entre personas del mismo sexo. Además, dijo que ante esto 33 estados de los Estados Unidos han aprobado legislación para impedir los matrimonios de homosexuales y que Puerto Rico necesita

hacer lo mismo. El evangelista pretendió comprometer a los presidentes de la Camara y el Senado, Charlie Rodriguez y Edison Misa Aldarondo, respectivamente, ante sus seguidores, al senalar que ambos fueron educados bajo modelos religiosos.

LA EXPOSICION de motivos de la medida coloca el homosexualismo al mismo nivel de la criminalidad, la violencia domestica y el abuso de menores como algunos de "los males" que contribuyen al debilitamiento de la "institucion familiar tradicional".

Por otro lado, el reverendo reclamo la aprobacion de un proyecto que aumenta a 21 anos la edad para permitir la compra y consumo de bebidas alcoholicas y reprobo la politica de la administracion Rossello de promover el juego como un mecanismo para generar ingresos.

Tambien auguro que eventos de violencia como los que ocurrieron en la carcel del sector Las Cucharas, de Ponce, se repetiran, si no se ponen en vigor programas de rehabilitacion efectivos,

"Hoy como nunca antes nos encontramos ante una situacion explosiva en el sistema carcelario del pais", dijo Rascke.

Tab A-2

12/9/2014

ADENDI



PORTADA

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ZERO NUPTIALS BETWEEN HOMOSEXUALS

Thu, February 9, 1997

EI NUEVO DIA

By JUANITA COLOMBANI, SPECIAL TO EL NUEVO DIA
REPRESENTATIVES of the New Progressive Party Epifanio Jimenez and Carlos Diaz agreed to a petition from two moralist groups and evangelist Jorge Rascke and introduced a draft law that clearly prohibits marriage between persons of the same sex.

In the Civil Code of Puerto Rico it is implicit that marriage can only be carried out between men and women. But, the measure anticipates a case pending adjudication in the Supreme Court of the United States, which has before it a case from Hawaii, where in 1993 the Supreme Court of that state concluded that banning marriages between same sex could be discriminatory.

Here, the Civil Code provides that marriage 'is a civil institution that comes from a civil contract under which a man and a woman mutually agree to become husband and wife ... "

The measure was introduced last Friday and released yesterday by the Reverend Rascke in the press conference prior to his presentation at the edition number 23rd edition of the religious act Clamor to God, which happens each year is during the Labor Day holiday to evangelize and raise funds for the ministry of the same name.

CONTRARY to previous occasions – like last year which was an election year – the presence of politicians was scarce. Rascke said that governor Pedro Rossello and the Mayor of San Juan, Sila Calderon, personally communicated to him could that they could not attend. Neither did the quantity of spectators resemble that of previous years. Transit in the areas surrounding the Capital was light, even minutes before the message of Rascke began.

However, the Secretary of State, Norma Burgos, attended the ceremony in her capacity as interim governor and delivered a short message.

About the project, Rascke explained that it proposes to add a new article to the Civil Code of Puerto Rico. He said that the measure was lobbied for by the anti-abortion group Pro Life and the organization Morality in Media.

To justify their objectives, Rascke said that if the Supreme Court of the United States confirms the opinion of Hawaii, it could force ministers and priests here to perform marriages between persons of the same sex. In addition, he said that in light of this 33 states in the United States have passed legislation to prevent gay marriages and Puerto Rico needs do the same. The evangelist hoped to hold the presidents of the House and Senate, Charlie Rodriguez and Edison Misla Aldarondo, respectively, accountable to his followers, pointing out that both were educated under religious models.

THE STATEMENT of motives of the measure places homosexuality on the same level as criminality, domestic violence, and child abuse as some of "the evils" that contribute to the weakening of the "traditional family institution."

On the other hand, the reverend demanded the approval of a project that increases to 21 years old the age required for the purchase and consumption of alcoholic beverages and condemned the policy of the Rossello administration to promote the game as a mechanism for generating revenue.

He also predicted that violent events such as those that occurred in the jail in Las Cucharas, Ponce, will be repeated, if effective rehabilitation programs are not put in place.

"Today as never before we face an explosive situation in the prison system of the country," said Rascke.

Tab B-1

Asociación Internacional de Pastores y Líderes Unidos

Octubre 14, 1997.

Dr. Osvaldo Font
Presidente

Hon. Camara de Representantes
Puerto Rico

Re: PC.1013

Buenos Dias distinguidos representantes, que el Señor les continúe Bendiciendo.

Mi nombre es el Dr. Osvaldo Font y vengo en representación de la Asociación Internacional de Pastores y Líderes Unidos.

Nuestra posición es la siguiente: Dios instituyo el Matrimonio tan lejos como el Paraíso debido a que en Génesis 2:20 no se había encontrado ayuda idónea para el, y (22) de la costilla que Jehová Dios tomo del hombre, hizo una mujer y la trajo al hombre.

En Mateo 19:5 Por esto el hombre dejara padre y madre, y se unirá a su mujer, y los dos serán una sola carne (6) así que no son ya mas dos, sino una sola carne; por tanto lo que Dios junto , no lo separe el hombre.

1Cor 7:39 la mujer casada esta ligada por la ley mientras su marido vive, pero si su marido muriere, libre es para casarse con quien quiera, con tal que sea en el Señor.

Pablo en Col 3:18 Casadas, estad sujetas a vuestros maridos, como conviene en el Señor (19) Maridos, amad a vuestras mujeres

La Palabra de Dios nos habla de hombre y mujer todo lo que esta fuera de ello esta fuera de la Palabra y no lo podemos respaldar

*Iglesia Pentecostál Fuente de Agua Viva
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(787) 891-3695*

Asociación Internacional de Pastores y Lideres Unidos

Rom 1:27 y de igual modo tambien los hombres, dejando el uso natural de la mujer, se encendieron en su lascivia unos con otros, cometiendo hechos vergonzosos hombres con hombres, y recibiendo en si mismos la retribucion debida a su estravio

(32) los que practican tales cosas son dignos de muerte, no solo las hacen, sino que tambien se complacen con los que las practican

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Tab B-2

International Association of United Pastors and Leaders

October 14, 1997.
Dr. Osvaldo Font
President

Hon. House of Representatives
Puerto Rico

Re: PC. 1013

Good Morning distinguished representatives, may the Lord continue to bless you.

My name is Dr. Osvaldo Font and I come on behalf of the International Association of United Pastors and Leaders.

Our position is the following: God created marriage just as he created Heaven according to **Genesis 2:20** he had not found suitable help, and **(22)** from the rib which the Lord God took from man, he made woman and brought him to man.

In Matthew **19:5** therefore man leaves father and mother, and shall unite unto his wife, and the two shall be one flesh **(6)** so they are no longer two, but one flesh; therefore what God united, no man may separate.

1Cor 7:39 the married woman is bound by law while her husband lives, but if her spouse dies, she is free to marry anyone she wishes, as long as it is in the Lord.

Paul in **Col 3:18** Wives, submit yourselves unto your husbands, as is fitting in the Lord **(19)**
Husbands, love your wives

The Word of God speaks to us of man and woman everything that is out of this is out of the Word we cannot support Rom 1:27 and likewise also the men, leaving the natural use of the woman, burned in their desire toward one another, **men committing shameless acts with men,** and receiving in themselves the retribution for their deviance **(32)** those who practice such things are worthy of death, not only those that do it, but also those that approve of those who practice it.

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Tab C-1

7/10/17



CONCILIO EVANGÉLICO DE PUERTO RICO

Sobre el matrimonio entre personas del mismo sexo Proyecto de la Cámara de Representantes 1013

Oficina:
Calle el Roble #54 (altos)
Río Piedras, Puerto Rico

Apartado 21343
Río Piedras
Puerto Rico 00928

Tel. (809) 765-6030
Fax 765-5977

"Para que todos sean uno; como tú, oh Padre, en mí, y yo en tí, que también ellos sean uno como nosotros; para que el mundo crea que tú me enviaste." *Juan 17:21*

Iglesias Bautistas de Puerto Rico
Iglesia Evangélica Unida de Puerto Rico
Iglesia Metodista de Puerto Rico
Iglesia Cristiana (Discípulos de Cristo) en Puerto Rico
Sínodo de Boriquén
Iglesia de los Hermanos
First Union Church
Second Union Church

Junta Directiva

Rvdo. Juan A. Vera
Presidente
Rvdo. Héctor Soto
Secretario
Dr. Jesús M. Colón
Tesorero
Rvdo. Moisés Rosa
Secretario Ejecutivo

El Concilio Evangélico de Puerto Rico es una entidad de las siguientes Iglesias: Iglesias Bautistas de Puerto Rico, Iglesia Evangélica Unida de Puerto Rico, Iglesia Cristiana (Discípulos de Cristo) en Puerto Rico, la Iglesia Metodista de Puerto Rico, El Sínodo de Boriquén, La Iglesia de Los Hermanos. First and Second Union Church.

Comparecemos ante ustedes para expresar nuestra opinión sobre Proyecto de la Cámara de Representantes 1013 que, tiene como fin enmendar el Código Civil de Puerto Rico, para hacer explícito en el Artículo 71 añadiendo un nuevo inciso, numerado 7, para prohibir el matrimonio entre personas del mismo sexo. Las Iglesia que forman el CEPR, consciente de que este tema incumbe al bienestar de la familia y que es de interés general de toda la sociedad afirma lo siguiente:

1. La moral cristiana, tal y como se expresa en la Biblia, sólo reconoce como válido el matrimonio entre personas de sexo opuesto, que no estén ligados por nexos de sangre, o por relaciones familiares. Explícitamente la relación entre personas del mismo sexo es descrita en (Rom.1:26-27). Nuestras iglesias han declarado, continuamente que están opuestas a este tipo de relación como conducta aceptable y legal.

2. Las Iglesias están también está consciente que continuamente enfrenta situaciones que tiene que ver con el carácter y las preferencias de relación entre personas de mismo sexo. En muchas ocasiones, estas situaciones se dan dentro de familias de las iglesias o entre personas que llegan con diferentes necesidades de carácter pastoral. Nuestras iglesias ayudan y dan atención pastoral a estas personas y sus familias porque son parte de la comunidad, estableciendo que su preferencia sexual es sólo una parte de los diferentes problemas que tienen estas personas.

"Laborando con amor para la unidad del pueblo evangélico"

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3. Es importante decir que continuamente hemos pedido en varias ocasiones una revisión profunda al Código Civil. Hemos visto lo establecido en nuestro Código, en relación al matrimonio y la familia en general, no responde a las presentes necesidades de la familia actual, por lo que ha sido sometido continuamente a modificaciones.

Pedimos especialmente que se estudie la posibilidad de crear un Código de la Familia atemperado a los tiempos que vivimos.

Reiteramos nuestra posición en contra de establecimiento legal de matrimonios entre personas del mismo sexo. Y nuestra disposición pastoral a atender a toda persona sin importar su caracter o preferencias.

Reiteramos nuestra disposición a colaborar en todo lo que sea de bienestar para nuestro pueblo.


Rvdo. Moisés Rosa Ramos
Secretario Ejecutivo

7 de octubre de 1997

Tab C-2



EVANGELICAL COUNCIL OF PUERTO RICO

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"That they all may be one, as
You, Father, are in Me, and I in
thee, that they also may be one
like us: that the world may
believe that you sent me." *John*
17:21

**Baptist Churches
of Puerto Rico
United Evangelical Church of
Puerto Rico
Puerto Rico Methodist Church
Christian Church (Disciples of
Christ)
in Puerto Rico
Boriquén Synod
Church of the Brethren
First Union Church
Second Union Church**

Board of Directors

Rev. Juan A. Vera
President
Rev. Dr. Hector Soto Secretary
Dr. Jesús M. Colón.
Treasurer
Rev. Moses Rosa
Executive Secretary

**Regarding marriage between persons of the same sex
Bill of the House of Representatives 1013**

The Evangelical Council of Puerto Rico is an entity of the following churches: Baptist Churches of Puerto Rico, United Evangelical Church of Puerto Rico, Christian Church (Disciples of Christ) in Puerto Rico, the Methodist Church of Puerto Rico, The Synod of Boriquén, the Church of The Brothers. First and Second Union Church.

We appear before you to express our opinion on the Bill of the House of Representatives 1013, that aims to amend the Civil Code of Puerto Rico, to make explicit in Article 71 adding a new paragraph, numbered 7, to prohibit same sex marriage. The Church that forms the CEPR, aware that this issue lies with the welfare of the family and is in the general interest of the whole society affirms the following:

1. Christian morality, as expressed in the Bible, only recognizes as valid the marriage between persons of the opposite sex, who are not related by blood ties, or family relationships. Explicitly the relationship between persons of the same sex is described in (Rom. 1: 26-27). Our churches have stated continually that they are opposed to this type of relationship as acceptable and legal conduct.
2. The Churches also are aware that we continually face situations that have to do with the character and relationship preferences between persons of the same sex. In many cases, these situations occur within families of churches or between people who come with different needs of pastoral character.

Our churches help and provide pastoral care for these people and their families because they are part of the community, establishing that sexual preference is only part of the various problems that these people have.

"Laboring with love for the unity of the evangelical people"

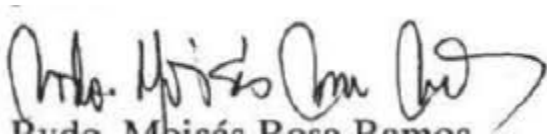
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3. It is important to say that we have continually asked several times for a profound revision of the Civil Code. We have seen that what is set out in our Code, in relation to marriage and the family in general, does not meet the present needs of today's family, which has been continuously subject to change.

We ask especially that the possibility of a Family Code tempered to the times we live in be studied.

We reiterate our position against the legal establishment of marriages between persons of the same sex. And our pastoral care for everyone regardless of their character or preferences.

We reiterate our willingness to cooperate in all that is for the well-being of our people.



Rev. Moses Rosa Ramos

Rev. Moses Rosa Ramos
Executive Secretary

7 October, 1997

Tab D-1

Ponencia del Rev. Héctor Rivera
Secretario de la
Iglesia de Dios Pentecostal M.I.
Región de Puerto Rico
en relación al P. de la C. 1013
8 de octubre de 1997

Honorable Anibal Vega Borges, Presidente de la Comisión de lo Jurídico Civil de la Camara de Representantes y demás miembros de la misma. Buenos días a todos. Mi nombre es Héctor Rivera Rentas. Comparezco en representación de la Iglesia de Dios Pentecostal M.I., Región de Puerto Rico a expresar nuestro apoyo al P. de la C. 1310.

La Iglesia de Dios Pentecostal M.I., Región de Puerto Rico es la mayor denominación evangélica en nuestra isla. Desde el 1916 y hasta el presente, 81 años, hemos sido una institución al servicio de Dios, y en favor de la gran familia puertorriqueña.

Esta organización eclesiástica cuenta con 555 congregaciones, 950 miembros en su cuerpo ministerial, alrededor de 65,000 feligreses y 20,340 familias. Contamos con Asociaciones de Damas, Caballeros, Jóvenes, Niños, y aún de Pastores Jubilados. En adición a ello, dinámicos Departamentos como el de Evangelismo y Misiones, Educación Cristiana y Familia, Servicios Sociales, Comunicaciones, etc. realizan una efectiva labor en el cumplimiento de nuestra misión de servicio. La emisora Radio Triunfo 96.9 FM, el Canal 46 y la Revista El Evangelista Pentecostal son los medios de comunicación masiva con que contamos para difundir el Evangelio de Jesucristo desde nuestra perspectiva bíblica en y fuera de Puerto Rico.

Es en representación y a nombre de estos servidores de Dios y de nuestro pueblo que decimos presentes en este significativo y coyuntural momento de nuestra historia.

Hacemos acto de presencia ante esta digna Comisión como Iglesia cristiana evangélica y fundamentalista para exponer y defender "los derechos de Dios" sus "derechos de autor" como creador de todas las cosas. Al así hacerlo, estaremos defendiendo a su vez los mejores intereses del individuo y la sociedad, ya que las disposiciones divinas tienen como objeto el sumo bienestar de sus criaturas. Es a la

Iglesia como legítima representante del Creador en esta dimensión de su vasto imperio, a la que le corresponde dar a conocer el punto de vista de Dios en lo que se refiere a las correctas relaciones entre sus criaturas humanas. Hoy cumplimos con humildad pero con valentía y firmeza esa función.

Apoyamos la aprobación del P. de la C. 1310 por las siguientes razones:

Razones Biológicas

La naturaleza biológica misma del ser humano manifiesta la diferencia y complementariedad de los sexos. Existen sólo dos sexos, el masculino y el femenino. Anatómicamente se evidencia la correspondencia de los órganos sexuales masculinos y femeninos. En la búsqueda de la satisfacción sexual de forma natural se hace obvio la función de los órganos sexuales.

La diferenciación y complementariedad de los sexos hace posible la procreación natural de seres semejantes a la pareja, lo que a su vez permite la perpetuación de la raza. Esto no podría producirse si las personas de un mismo sexo evitaran la copulación con personas del otro sexo.

Por una simple y sencilla razón de subsistencia no es aconsejable propiciar el matrimonio de personas de un mismo sexo. Si a esto añadimos las implicaciones de salud en las relaciones innaturales entre hombres, de lo cual el SIDA es el más terrible y elocuente testigo, es claro el derrotero al que nos dirigiría inexorablemente esta práctica, a la extinción de la especie.

Razones Sociológicas

Demás esta decir que desde los albores mismos de la historia las civilizaciones han seguido la norma natural de la relación heterosexual. La homosexualidad ha sido siempre la excepción a la regla. La dimensión de compañerismo y cooperación que existe en el matrimonio, se complementa con la extensión de la raza humana, dando paso a la unidad familiar y a su función como tal.

La familia como primera escuela y los padres como primeros maestros, transmiten a sus hijos los valores morales, éticos y espirituales que le llevan a producir una sociedad sana. Los valores se desarrollan cuando se modelan y se ejemplarizan; así también ocurre con los negativos o falsos valores.

El niño que crece observando a sus padres en su desempeño de las funciones que les corresponden en la sociedad, crecerá reafirmando esa función y en el futuro la realizará cuando le corresponda sea hombre o mujer.

Desde que se instituyó el gobierno humano, el hombre ha necesitado de leyes que rijan su vida. Nuestra cultura, afro-indo-hispanoamericana, ha sido una de altos valores morales que nos han formado como pueblo, por siglos.

Hoy los grupos que apoyan la homosexualidad ponen en peligro la sana convivencia, al solicitar unos derechos, unas libertades y una igualdad que tal conducta y preferencia sexual hace inaceptables. Nosotros como representantes de un sector de la iglesia cristiana en Puerto Rico, apoyamos la gestión hecha por esta Cámara de Representantes, para que quede bien claro que en esta tierra no se permitirá el matrimonio entre personas del mismo sexo.

La Iglesia de Dios Pentecostal M.I., a través de su historia en esta isla, ha enseñado los más firmes y sólidos conceptos de la moralidad en el ser humano. Por ninguna circunstancia estaríamos dispuestos a efectuar y a solemnizar matrimonios entre personas de un mismo sexo aunque esto signifique desacatar cualquier orden judicial que así lo disponga. Haciéndolo así, estaremos a favor de lo dispuesto por Dios, defendiendo los derechos de Dios y el bienestar de la raza humana.

Razones Sicológicas

Es evidente que esta disfunción en la conducta produce graves efectos sicológicos y emocionales. Testimonios recibidos de personas que han sido homosexuales dan cuenta del profundo y continuo sentimiento de culpa que le produjo este desorden en su conducta. Por regla general la autoestima de estas

personas es relativamente baja y manifiestan un gran resentimiento contra sus padres a quienes tienden a culpar por su situación. Esto también les lleva al retraimiento y a la soledad, lo cual conduce en muchos casos a decidirse por el suicidio como forma de escape a su realidad.

Una relación con otra persona del mismo sexo, con la misma problemática, lejos de ayudarle profundizará más tales sentimientos sin que puedan hallar la paz que buscan.

Razones Bíblico-teológicas

En la creación, Dios dejó establecido con claridad cuál y cómo sería la relación entre hombre y mujer. Al decir la Sagrada Escritura que “varón y hembra los creó” no dejó margen para otra cosa. Y vas más lejos cuando dice que “se unirá el hombre a su mujer y serán los dos una sola carne”. Esto hace diferencia entre ambos sexos y a la vez presenta a la mujer como complemento del hombre y viceversa, física, emocional, social y espiritualmente. Cualquier otra disposición, producto del hombre y su mentalidad terrenal es contraria al principio divino y por tanto no natural.

Uno de los mandatos de Dios a aquella pareja fue la procreación, es decir, la reproducción del género humano: creced y multiplicaos, enchid la tierra”. Tal cosa sería imposible en una relación contra naturaleza, como lo sería el matrimonio entre personas del mismo sexo. La homosexualidad rompe con lo establecido por Dios, pues el propósito divino es imposible de cumplir por los tales, constituyéndose esta actitud en una rebelión abierta contra el dictamen de Dios.

Por otro lado, tanto al Israel de Dios en el Antiguo Testamento bíblico como a la Iglesia de ayer y de hoy se le ha señalado lo pecaminoso y lo desagradable a Dios Todopoderoso de la conducta homosexual. Es de todos conocidos lo ocurrido a las ciudades de Sodoma y Gomorra. La ley judía rechazaba el que hubiera

“sodomitas” (que es sinónimo de homosexual) en Israel (Deut. 23:17), porque Dios los abominaba. Lo mismo se repite en los libros de Los Reyes y el libro de Job.

San Pablo le escribe a los romanos definiendo como “extravío” tal conducta. El Diccionario de la Real Academia Española define “extravío” y sus derivadas como “de costumbres desordenadas, dejar la forma de vida que se había empezado y tomar otra distinta y desorden en las costumbres”. Así deja claro la Iglesia de Dios Pentecostal M.I., Región de Puerto Rico su interpretación del texto bíblico, refiriéndose a la homosexualidad como un dejar lo establecido por Dios para tomar el desorden, lo impuro y lo que es contra naturaleza.

La Primera Carta a los Corintios nos dice que entre aquellos para quienes esta vedada la entrada al reino de Dios, entre otros, están “los afeminados y los que se echan con varones” (1 Cor. 6:9). En este contexto se argumenta sobre la santidad y pureza del cuerpo. El rechazo de Dios a todo lo que atente contra esto es evidente y puntualizado aquí. La iglesia le da continuidad defendiendo la disposición de Dios al respecto.

Vale aclarar que no hay ni habrá rechazo a la persona, sino a su conducta claramente pecaminosa. La oración y otros recursos espirituales poderosísimos, junto con la consejería y ayuda psicológica están disponibles en la Iglesia para ayudar al necesitado a superar su condición y modificar su conducta. El arrepentimiento es un volver a lo establecido por Dios. Tanto el testimonio bíblico como del presente demuestran el poder transformador del Evangelio en casos de personas que manifestaban una conducta homosexual (1 Cor. 6:11)

No podemos concluir esta exposición sin antes agradecer a esta Comisión la oportunidad de dirigirnos a ustedes, así como también felicitar a los proponentes de este proyecto por la sensibilidad demostrada al captar el problema moral, social, y espiritual que representa el matrimonio entre personas del mismo sexo.

Muchas gracias.

Tab D-2

**Presentation by Rev. Hector Rivera
Secretary of the
Church of God Pentecostal MI
District of Puerto Rico
in relation to House Bill 1013
October 8, 1997**

Honorable Aníbal Vega Borges, President of the Civil Judiciary Committee of the House of Representatives and members of the same. Good morning everyone. My name is Hector Rivera Rentas. I appear on behalf of the Church of God Pentecostal MI, District of Puerto Rico to express our support for H.B. 1310.

The Church of God Pentecostal MI District of Puerto Rico is the largest Protestant denomination in our island. From 1916 to the present, 81 years, we have been an institution in the service of God, and for the great Puerto Rican family.

This ecclesiastical organization has 555 congregations, 950 members at its ministerial body, about 65,000 parishioners and 20,340 families. We have Associations of Women, Men, Youth, Children, and even Retired Pastors. In addition to this, dynamic Departments such as the Evangelism and Missions, Christian Education and Family Social Services, Communications, etc. perform an effective role in fulfilling our mission of service. The broadcast Radio Triunfo 96.9 FM, Channel 46 and The Pentecostal Evangelist Magazine are the mass media we use to spread the Gospel of Jesus Christ from our biblical perspective in and out of Puerto Rico.

It is in representation and in the name of these servants of God and of our people we speak presently in this significant and critical juncture in our history.

We make an appearance before this worthy Commission as an evangelical and fundamentalist Christian Church to expound and defend "the rights of God," his "copyright" as the creator of all things. By so doing, we will be defending in turn the best interests of the individual and society, given that divine provisions are aimed at the high welfare of his creatures. It is the Church as the legitimate representative of the Creator in this dimension of his vast empire, that is assigned to publicize the standpoint of God in regard to the

proper relationship between his human creatures. Today we meet with humility but with courage and determination that function.

We support the approval of H.B. 1310 for the following reasons:

Biological Reasons

The very biological nature of human beings manifests the difference and complementarity of the sexes. There are only two sexes, male and female. Anatomically it is evidenced by the correspondence of male and female sexual organs. In seeking sexual satisfaction naturally, the function of the sexual organs is obvious.

Differentiation and complementarity of the sexes allows natural procreation of the couple like beings, which in turn allows the perpetuation of the race. This could not happen if people of the same sex avoid coupling with the other sex.

For the basic and simple reason of subsistence it is not advisable to encourage the marriage of persons of the same sex. If we add to this the health implications in unnatural relations between men, of which AIDS is the most terrible and eloquent witness, it is clear where this practice would inexorably lead us, to the extinction of the species.

Sociological Reasons

Needless to say that since the dawn of history civilizations have followed the natural norm of heterosexual relationship. Homosexuality has always been the exception to the rule. The dimension of partnership and companionship that exists in marriage, is complemented by the extension of the human race, giving way to the family unit and its function as such.

The family as the first school and parents as the first teachers, transmit to their children the moral, ethical and spiritual values that produce a healthy society. The values are developed when modeled and are exemplified; so it is with the negative or false values.

The child that grows up watching their parents in their performance of the roles that correspond to them in society, will grow reaffirming that function and in the future they will perform it when appropriate as a corresponding man or woman.

Since human government was instituted, man has need of laws that govern their lives. Our culture, Afro-Indo-Hispanicamerican, has been one of high moral values that have shaped us as a people for centuries.

Today the groups supporting homosexuality threaten a healthy coexistence, in asking for rights, for freedom and for equality that such conduct and sexual preference makes unacceptable. We as representatives of a sector of the Christian church in Puerto Rico, support the arrangement made by the House of Representatives, to make it very clear that in this land marriage between persons of the same sex is not allowed.

The Church of God Pentecostal M.I., through its history on this island, has taught the strongest and most solid concepts of morality in humans. Under no circumstances would we be willing to perform and solemnize marriages between persons of the same sex even if it means disobeying any court order that so provides. In doing so, we would be acting in favor of the provisions of God, defending the rights of God and the welfare of the human race.

Psychological Reasons

Clearly this dysfunctional behavior causes serious psychological and emotional effects. Testimonials from people who have been homosexuals tell of the deep and

continuous feeling of guilt produced by this disorder in their behavior. Generally the self-esteem of these people is relatively low and they show great resentment against their parents who they tend to blame for their situation. This also leads them to solitude and loneliness, leading in many cases to decide suicide as a way to escape reality.

A relationship with another person of the same sex, with the same problem, far from helping further deepens such feelings without being able to find the peace they seek.

Biblical-Theological Reasons

In creation God clearly established what and how the relationship would be between man and woman. By the Sacred Scripture saying that "he created Male and female" left no room for anything else. And it goes further in saying that "man shall unite to his wife and the two shall become one flesh." This creates difference between the sexes and also presents women as a complement of man and vice versa, physically, emotionally, socially and spiritually. Any other arrangement, the product of man and his earthly mindset, is contrary to the divine principle and therefore not natural.

One of the mandates of God to that couple was procreation, i.e., the reproduction of mankind: be fruitful and multiply, on the earth". This would be impossible in a relationship against nature, as would be the marriage between persons of the same sex. Homosexuality breaks with that established by God, because God's divine purpose is impossible to accomplish in such ways, constituting an attitude in open rebellion against God's judgment.

On the other hand, both the God of Israel in the Old Testament like the Church of yesterday and today has declared homosexual behavior sinful and displeasing to God Almighty. It is known to all what happened to Sodom and Gomorrah. Jewish law would

have rejected the "sodomites" (synonymous with homosexual) in Israel (Deut. 23:17), because God abhorred it. The same is repeated in the Books of Kings and the Book of Job.

St. Paul wrote to the Romans, defining as "devious" such conduct. The Dictionary of the Royal Spanish Academy defines "devious" and its derivatives as "disordered habits, leaving one lifestyle that had begun to start another of different and disordered habits". This makes clear to the Church of God Pentecostal MI, District of Puerto Rico the interpretation of the biblical text, referring to homosexuality as leaving that established by God has to partake in disorder, the unclean and what is against nature.

The First Letter to the Corinthians tells us that those who are forbidden entrance into the kingdom of God, among others, are "the effeminate and those that lie with men" (1 Cor. 6:9). In this context it is argued about the sanctity and purity of the body. The rejection of God to anything that threatens this is obvious and pointed here. The church gives continuity to the defense of God's disposition with respect to this.

It is worth mentioning that there will not be any rejection of the person, but rather of his clearly sinful behavior. Prayer and other very powerful spiritual resources, along with counseling and psychological support are available in the Church to help the needy overcome their condition and change their behavior. Repentance is a return to the ordinance of God. Both the biblical witness and the present demonstrate the transforming power of the Gospel in cases of people who showed homosexual behavior (1 Cor. 6:11)

We can not conclude this exhibition without thanking the Commission for the opportunity to address you as well as congratulating the proponents of this project for the sensitivity shown in grasping this moral, social, and spiritual problem, which marriage between persons same sex represents.

Tab E-1

Movimiento Unión Cristiana Misionera, Inc., M.I.
G.P.O. Box 107, San Juan, P.R. 00936

PONENCIA

Re : Ponencia del Rvdo. Avildasir Díaz Cruz, ante la Comición De Lo Jurídico Civil.
Sobre proyecto de la Camara **1013** " para adicionar un nuevo inciso (7) al Artículo 71 del codigo civil de Puerto Rico, según enmendado, a los fines de declarar incapaces para contraer matrimonio entre si a las personas de un mismo sexo.

Sr. Presidente de la Comición y distinguidos miembros de la misma. Mi nombre es Rvdo. Avildasir Díaz Cruz y comparezco en nombre y como Presidente del Concilio de iglesias Unión Cristiana Misionera Inc. M.I. y como pastor de una de dichas iglesias en la ciudad de Levittown Toa Baja, P. R. Agradesco a esta Comición la oportunidad que me brinda para deponer en relación a este importantísimo proyecto moral.

Quiero felicitar a los Representantes, Hon. Jimenez Cruz y Hno. Carlos Díaz Sánchez, por haber radicado este proyecto y a los Representantes y Senadores que le han brindado su apoyo. Nuestro deseo de participar en estas vistas es con el proposito de dejar saber bien claro cual es nuestra posición en cuanto al proyecto de la Comición **1013**. Le damos nuestro respaldo 100% para que se apruebe. Todo el mundo sabe que la unión de un hombre y una mujer es lo que fue ordenado por Dios mismo como el matrimonio varón y hembra, Dios no hizo un tercer sexo solo varón y hembra. No se nace siendo un homoxesual ó lesbiana, simplemente niño ó niña asi que cuando estos van creciendo nunca cambian de sexo. Pero el pecado del hombre trae rebelión contra el creador y hace que éste aprenda normas de conductas aberradas, dirigidos por deseos carnales que son despertados en la mente y conciencia del ser humano por la falta de conocer a Dios, que lo ponen en desventaja contra las fuerzas del mal que tienen su influencia en la vida de muchos hombres que no quieren obedecer lo que Dios dice en su palabra para conocer lo que es desde el principio. El pecado es el producto de obedecer al señor de las tinieblas desobedeciendo de esta manera a Dios. La biblia señala al homoxesual muy claramente y cito:

1ra. Corintios 6: 9-10 ¿No sabéis que los injustos no heredarán el reino de Dios? No erréis; ni los fornicarios, ni los idólatras, ni los adúlteros, ni los afeminados, ni los que se echan con varones, ni los ladrones, ni los avaros, ni los borrachos, ni los maldicientes, ni los estafadores, heredarán el reino de Dios.

"Yo en ellos y tú en mí, para que sean perfectos en unidad" Juan 17:23

Romanos 1:27- De igual modo también los hombres, dejando el uso natural de la mujer, se encendieron en sus lascivia unos con otros, cometiendo hechos vergonzosos hombres con hombres y resibiendo en sí mismos la retribución debida a su extravio.

Así que estamos hablando de una unión que Dios desapruaba porque es contrario a lo que el ha establecido para nosotros. Que hagamos uso del sexo natural dentro de los parametros que Dios ha aprobado. Creo que nosotros los lideres espirituales y esta Comición, y todo el que tiene moral en este país debe respaldar esta medida que es un freno a la inmoralidad. Sabemos que hay personas de un mismo sexo que en P.R. viven como si fueran matrimonios y no solo aqui sino en otras partes del mundo, pero aqui no le vamos a permitir lo que ha sucedido en otros lugares, no a las bodas de homosexuales en P.R. Muchas gracias.

Tab E-2

Christian Missionary Union Movement, Inc., M.J.

G.P.O. Box 107, San Juan, P.R. 00936

LECTURE

Re: Presentation by Rev. Avildasir Diaz Cruz, before The Civil Judicial Commission. Regarding House Bill 1013 "to add a new subsection (7) Article 71 of the Civil Code of Puerto Rico, as amended, for the purpose of declaring people of the same sex unable to marry each other.

President of the Commission and distinguished members of the same. My name is Rev. Avildasir Diaz Cruz and I appear on behalf and as Chairman of the Council of Churches Christian Missionary Union Inc. MI and as pastor of one of these churches in the city of Levittown Toa Baja, PR. I thank this Commission for the opportunity afforded me to speak regarding this most important moral project.

I want to congratulate the Representatives, Hon. Jimenez Cruz and Bro. Carlos Díaz Sánchez, having settled on this project and the Representatives and Senators who have supported him. Our desire to participate in these hearings is for the purpose of making it known very clearly what our position is on Bill 1013. We give it our 100% support that it be approved. The entire world knows that the union of a man and a woman is what was ordained by God as a marriage of male and female, God did not make a third sex, only male and female. No one is born a lesbian or homosexual, but simply a boy or girl such that as they grow they will never change sex. But man's sin brings rebellion against the Creator and causes it to learn rules of aberrant behaviors, led by carnal desires that are awakened in the mind and consciousness of human beings for lack of knowing God, which places man at a disadvantage against evil forces that have an influence on the lives of many men who do not want to obey what God says in his word to know what is from the beginning. Sin is the product of obedience to the Lord of Darkness, thus disobeying God. The Bible points to the homosexual very clearly and I quote:

First Corinthians 6: 9-10 Know ye not that the unrighteous shall not inherit the kingdom of God? Do not be deceived; neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with mankind, nor thieves, nor covetous, nor drunkards, nor revilers, nor extortioners, shall inherit the kingdom of God.

"I in them and thou in me, that they may be perfected in unity" John 17:23

Romans 1: 27- Likewise also the men, leaving the natural use of the woman, burned in their lust for one another, men committing shameless acts with men and receiving in themselves the due penalty for their error.

So we're talking about a union that God disapproves because it is contrary to what he has set out for us. We must make use of natural sex within the parameters that God has approved. I think we spiritual leaders and this Commission, and everyone who has morals in this country should support this as a brake to immorality. We know that there are people of the same sex that live in PR as if they were married, not only here but in other parts of the world, but here we will not allow what has happened elsewhere, no to the marriage of homosexuals in P.R. Thank you very much.

Tab F-1

Angel Hernandez

15 DE OCTUBRE DE 1997

POSICION DEL CONCILIO DE LA IGLESIA DE DIOS "M.B."
DE PUERTO RICO

Comparezco ante esta Honorable Comisión Como Supervisor Nacional del Concilio de las Iglesias de Dios "M.B." en Puerto Rico en representación de cientos de iglesias en casi todos los pueblos de la Isla.

Traigo ante este Honorable Cuerpo Legislativo el sentir y la oponión de nuestros 475 ministros cristianos y los miles de miembros y feligreses de la Iglesia de Dios "M.B." en nuestra Isla acerca de este proyecto que busca establecer de manera clara, la prohibición en nuestro código civil de los matrimonios entre personas del mismo sexo.

De entrada, quiero señalar que aunque algunos han querido minimizar o empequeñecer el propósito de esta medida considerándola innecesaria, porque de algún modo la prohibicion que persigue el proyecto está implícita en nuestro código civil tal, y como está, para nosotros no es así.

Para la Iglesia de Dios en Puerto Rico, la aprobación de esta medida está fundamentada para ayudarnos a lograr juntos a las autoridades de este país la sana convivencia, el crecimiento y el desarrollo del gran potencial de nuestro pueblo puertorriqueño. Desarrollo y crecimiento, pero manteniendo los sanos valores morales y espirituales que nos han caracterizado como pueblo. Yo me imagino que los honorables legisladores se habrán dado cuenta de que en Puerto Rico habemos muchas personas que creemos en Dios, leemos la Biblia y vivimos con temor y reverencia su Palabra. Que nos preocupa que día a día los puertorriqueños y todos los que viven aquí experimenten el deterioro de su conducta y de sus valores espirituales. Sobre el impacto que esto ha tenido en la familia puertorriqueña en esta comparecencia quiero destacar dos cosas.

En momentos de crisis cuando la visión de los pueblos se enturbian y la fe vacila, Dios llama a algunos de entre su pueblo para hacer llegar a los hombres y a las mujeres su palabra de entendimiento. Y esta responsabilidad que ahora recae sobre nosotros, el pueblo cristiano de Puerto Rico, la cumplimos revestidos de su autoridad para hablar la verdad.

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de Dios donde El nos mande. Esto nos pone en la disyuntiva de cumplir nuestro ministerio en medio de nuestro pueblo o callar. Y hoy en Puerto Rico, la iglesia evangélica no puede callar. Aunque no escuchemos el aplauso entusiasta de las multitudes, no nos dejaremos deducir por la demagogia de los mercaderes de la vida.

La interpretación que tiene la Iglesia sobre el casamiento entre personas del mismo sexo, es que éste es totalmente contrario a la imagen que nos presenta la naturaleza de la unión entre un hombre y una mujer.

El matrimonio entre personas del mismo sexo no es bíblico, no es normal, es contra la familia, que es la que garantiza la preservación de la especie humana y va en contra de la naturaleza.

La familia es un organismo social o un sistema. Nathán Ackerman, pionero en terapia familiar sugiere que el término, "organismo" connota el corazón biológico de la familia, su calidad de proceso de vida, unidad funcional, y su historia de vida natural es un período de germinación de nacimiento, de crecimiento, y desarrollo de capacidades para adaptarse a las crisis. Esto hace que una familia sea una familia sana.

Cualquier cosa que afecte una parte del organismo familiar, automáticamente afecta todas las partes, así como una mano infectada, lastimada o que funciona bien, afecta a todo el cuerpo.

En otras palabras, una pareja homosexual jamás tendrá la capacidad para moldear la identidad de una nueva familia, porque sus hijos, aunque sean adoptados, no podrán interpretar la rediferenciación de las individualidades de los miembros de la pareja matrimonial.

No solo habría caos en estas seudofamilias en la que se practicaría este embeleco matrimonial, sino que nuestros niños se verían amenazados ante la difícil interpretación de este estilo de vida, que para algunos psicólogos es un ejemplo de conducta desafiante y egocéntrica, obsesiva compulsiva, que tiene un concepto erróneo de la felicidad.

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La homosexualidad está dejando de ser algo secreto en nuestra sociedad, como está dejando de serlo también otras prácticas sociales que dañan y que amenazan nuestros estilos de vida. No quiere decir esto, que hay más homosexuales o que esta práctica haya incrementado, pero sí que el fenómeno se está haciendo más visible. Más personas homosexuales están exigiendo privilegios que ningún otro grupo de ciudadanos tienen en nuestra sociedad.

Han logrado en los últimos años mediante la presión sistemática que los caracteriza, que la asociación de psiquiatras de Norteamérica votara finalmente a favor de quitar la homosexualidad de su lista oficial de trastornos mentales. Ya no se clasifica una enfermedad, según ellos. Dicha asociación ahora la consideran y designan como alteración en la orientación sexual.

Abundan las teorías acerca de las naturalezas, y las causas de la homosexualidad, con muy pocos conocimientos concretos al respecto. Sin embargo, nosotros coincidimos con el sector de psicólogos y psiquiatras que la consideran como una disfunción patológica.

Quisiera llevarlos a ustedes al libro que inspiró la constitución de los Estados Unidos, entendiendo los padres de la nación Norteamericana que para establecer las leyes que rigieran esa nación, tenían que mirar las enseñanzas éticas del libro de Dios.

Esta Biblia que enseña y educa que para poder ser un servidor efectivo, se tiene que escuchar atentamente la voz del pueblo. Y como parte de este pueblo, la Iglesia deja sentir su voz en dirección hacia lo que dice la Biblia y sus principios éticos que Dios creó a un hombre que a pesar de que todo lo que creó era bueno, se percató de que para completar su obra necesitaba instituir una familia. Y la fuente de sabiduría decidió que fuera una mujer la que se uniera a este

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hombre. Señores, cualquier cosa que atente contra este designio divino, es una conspiración contra el mismo Dios. Los pueblos que han violado en la práctica, la norma establecida por Dios, han caído en la experiencia de Sodoma y Gomorra que fueron destruidos por su inmoralidad, especialmente por su deformidad sexual.

La noción bíblica de paz en su más amplio significado, se refiere a una situación de vida completa que incluye bienestar, salud y correcta relación con Dios y con los otros. Evidentemente el matrimonio homosexual no es una consideración ni a Dios ni al prójimo.

Quiero aclarar de inmediato cualquier confusión originada por los grupos homosexuales al querer aparecer ante la opinión pública como personas que pueden ser cristianos y al mismo tiempo practicar la homosexualidad. Como menciona la Biblia, en un mismo lugar no puede haber luz y tinieblas.

Nos escandaliza el hecho de que los grupos homosexuales sostengan que tienen una Iglesia y hagan creer que por tal razón tenemos que apoyar sus prácticas y que la Biblia las permite.

¿Qué les espera a las futuras generaciones puertorriqueñas si hoy no le salimos al paso a estas pretensiones que atentan contra la naturaleza del hombre?

Recomendamos a este Honorable Cuerpo Legislativo que apruebe este proyecto que constituye una restricción social sobre la elección del objeto sexual y que garantiza que nosotros los puertorriqueños podamos levantar nuestros hijos y nuestras familias en un ambiente ético moral. Muchas gracias. Que Dios les bendiga a todos.

Tab F-2

15 OCTOBER 1997

**POSITION OF THE COUNCIL OF THE CHURCH OF GOD M. B.
OF PUERTO RICO**

I appear before this Honorable Commission as National Supervisor of the Council of the Churches of God "MB" in Puerto Rico on behalf of hundreds of churches in almost every village of the island.

I bring before this Honorable Legislature the feeling and opinion of our 475 Christian ministers and thousands of members and parishioners of the Church of God "MB" in our Island on this project that seeks to establish clearly, the prohibition in our code civil marriages between persons of the same sex.

From the outset, I want to note that although some have tried to minimize or belittle the purpose of this measure considering it unnecessary, because somehow the ban that this bill pursues is implicit in our civil code already as it is, for us it is not so.

For the Church of God in Puerto Rico, the approval of this measure is founded on helping us to achieve together with the authorities of this country the healthy coexistence, the growth and the development of the great potential of our Puerto Rican people. Development and growth, while maintaining sound moral and spiritual values that have characterized us as a people. I imagine that the honorable legislators have noticed that in Puerto Rico we have many people that believe in God, read the Bible and live with fear and reverence for His Word. That we worry that day to day, Puerto Ricans and all those that live here will experience a deterioration in their behavior and their spiritual values. Regarding the impact this has had on the Puerto Rican family, in this hearing I want to highlight two things.

In times of crisis when the vision of people become cloudy and faith wavers, God calls some from among his people to reach men and women with an understanding of his word. And now this responsibility falls on us, the Christian people of Puerto Rico, to fulfill it coated with authority to speak the truth of God where He sends us. This puts us in the dilemma of fulfilling our ministry among our people or remaining silent. And today in Puerto Rico, the Evangelical Church can not remain silent. Although we do not hear the enthusiastic applause of the crowds, we will not stop from taking away the demagoguery of the merchants of life.

The interpretation that the Church has on marriage between persons of the same sex, is that this is totally contrary to the image presented to us in the nature of the union between a man and a woman.

The marriage between persons of the same sex is not biblical, is not normal, it is against the family, which is what guarantees the preservation of the human species, and it goes against nature.

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The family is a social organism or a system. Nathán Ackerman, a pioneer in family therapy suggests that the term "organism" connotes the biological heart of the family, the quality of life process, functional unit, and the history of natural life is a period of germination of birth, growth, and capacity to adapt to the crisis. This makes a family a healthy family.

Anything that affects one part of the family organism, automatically affects all parts, just like an infected hand, injured or well-functioning, affects the whole body.

In other words, a homosexual couple will never have the ability to shape the identity of a new family, because their children, even if adopted, will not be able to interpret the distinctions of the individuality of the members of the married couple.

There would not only be chaos in these pseudo-families where these delusional marriages would be practiced, but our children would be threatened with the difficult interpretation of this lifestyle, that for some psychologists is an example of defiant and egocentric behavior, obsessive compulsive, which has an erroneous conception of happiness.

Homosexuality is ceasing to be something secret in our society, as are other social practices that harm and threaten our way of life. This does not mean, that there are more homosexuals or that this practice has increased, but that the phenomenon is becoming more visible. More homosexuals are demanding privileges greater than those held by any other group of citizens in our society.

They have achieved in recent years by systematic pressure, to be characterized, for the association of psychiatrists in North America to finally vote in favor of removing homosexuality from its official list of mental disorders. It is no longer classified as a disease, according to them. This association is now considered and designated as changed sexual orientation.

Theories about the natures and causes of homosexuality, with very little concrete knowledge about it. However, we agree with the sector psychologists and psychiatrists who see it as a pathological dysfunction.

I would like to bring to you the book that inspired the Constitution of the United States, as the founding fathers of the North American nation understood that to establish the laws that govern this nation, they had to look at the ethical teachings of the book of God.

This Bible teaches and educates that to be an effective server, you have to listen carefully to the voice of the people. And as part of this community, the Church lends her voice toward what the Bible and its ethical principles say that God created

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a man who, despite everything he created being good, realized that to complete his work he needed to establish a family. And the source of wisdom decided that it was a woman that would be united to this man. Gentlemen, anything that goes against this divine plan is a conspiracy against God himself. The peoples who have violated in practice, the standard set by God, have fallen into the experience of Sodom and Gomorrah that were destroyed for their immorality, especially for their sexual deformity.

The biblical notion of peace in its broadest sense, refers to a situation of full life that includes wellbeing, health and proper relationship with God and with others. Obviously homosexual marriage does not consider either God or neighbor.

I want to immediately clarify any confusion caused by homosexuals wanting to appear before the public as people who can be Christians while at the same time practicing homosexuality. As mentioned in the Bible, in one place there cannot be both light and darkness.

We were shocked by the fact that that homosexual groups argue that they have a church and to advance that for this reason we need to support their practices and that the Bible permits them.

What awaits future Puerto Rican generations if we do not go out today to step into these claims that undermine the nature of man?

We recommend to this Honorable Legislature to approve this bill that constitutes a social restriction on the choice of this sexual concept and that ensures that we Puerto Ricans can raise our children and our families in a moral ethical environment. Thank you very much. May God bless you all.

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Rodolfo y Magali Font
Pastores

Misión Cristiana Fuente de Agua Viva Pabellón de la Fe

PONENCIA

Ponencia al Proyecto de la Cámara 1013 para adicionar un nuevo inciso (7) al Artículo 71 del Código Civil de Puerto Rico, según enmendado, a los fines de declarar incapaces para contraer matrimonio entre sí a las personas del mismo sexo.

Por: Iglesia - Concilio Misión Cristiana Fuente de Agua Viva

I - Saludos, Hon. Anibal Vega Borges, Presidente, honorables miembros de la Comisión Jurídico Civil, legisladores presentes, damas y caballeros.

II – Postura del Concilio Fuente de Agua Viva

Se dirige ante ustedes el Rev. Rodolfo Font, Apóstol Fundador de las Iglesias del Concilio Fuente de Agua Viva y Director Internacional de la Cadena de Radio, Televisión y Prensa NCN.

Nuestra Institución con todos los mecanismos de difusión cristiana en Puerto Rico y el extranjero es fiel defensora de los derechos civiles en todas partes del mundo. Respetamos en todo lo que corresponde la libertad de todos los seres humanos. Por lo tanto nuestra comparecencia en esta ocasión no responde a prejuicios personales en contra de los homosexuales, lesbianas ni ningún otro comportamiento que no sea el ordenado por Dios.

Estamos aquí porque entendemos que es de vital importancia dejar saber que la inmensa mayoría de nuestra sociedad puertorriqueña no comparte el uso y costumbre de esas aberraciones sexuales.

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... Al que tuviere sed, yo le daré gratuitamente de la fuente del agua de la vida. (Apocalipsis 21:6)

Nuestro pueblo es un pueblo cristiano y aunque amamos en lo personal a todos nuestros semejantes repudiamos rotundamente la conducta extraviada del sexo porque está en contra de los principios divinos y aún contra la naturaleza.

No es un derecho civil lo que atenta contra la civilización. No es un derecho divino lo que está en contra de la divinidad y no es un derecho natural lo que está en contra de la naturaleza.

No se puede reconocer como derecho lo que está torcido, desajustado, inmoral, obsceno, grosero, licencioso, lúbrico, procaz, inmundo, aberrado, impúdico, indecente, disfuncional y eso es lo que ocurre dentro del acto homosexual lamentablemente.

Indiscutiblemente a habido un aumento en este tipo de conducta dentro de nuestra sociedad; pero eso no lo hace en ninguna manera bueno o saludable como tampoco el uso de las drogas, el crimen y cualquier otra conducta impropia.

Dios condena este tipo de actividad y también la condena la conciencia sana, inteligente, despierta, llena de sentido común, libre de confusiones morales y espirituales de todo hombre o mujer que se respeta y se ama a sí mismo.

La vida misma esta en total desacuerdo ya que no se puede procrear como resultado de este tipo de relación sexual.

Los que pretenden el matrimonio entre parejas del mismo sexo tiene que reconocer que Dios, la vida y la naturaleza no les concede ese derecho porque no es derecho.

En nuestra Iglesia tenemos buenos feligreses que en un tiempo practicaban esta conducta pero ahora estan redimidos por la sangre

de Jesucristo y tienen una nueva vida y una nueva norma de conducta dentro de la sociedad.

El homosexualismo no es una enfermedad ni un castigo de Dios. Es una decisión personal que en su mayoría ha estado influenciada por otras personas o experiencias de desajuste moral y este pueblo todavía tiene moral. Como es una decisión personal no hay excusas para esa conducta, porque todos pueden cambiar.

Es por eso que ustedes representantes de este pueblo a quienes Dios les ha permitido legislar para que nunca en nuestra tierra se permita o se legisle el matrimonio entre parejas del mismo sexo, deben aprobar este proyecto 1013 para que conste en beneficio de todos y especialmente nuestros niños que serán los adultos del mañana, para que no decidan por esa conducta.

Ustedes cuentan con todo el apoyo moral y espiritual de todo cristiano y ciudadano cuya mente no se haya rendido a las pasiones del sexo desajustado.

Entrego en este momento la firma de miles y miles de personas de nuestras Iglesias, amigos y simpatizantes en apoyo a esta reglamentación por reconocerla de vital importancia para un estilo de vida saludable y provechoso.

Con esta ley no habrá dudas ni titubeos de que en nuestra tierra jamás las leyes de Dios serán pasadas por desapercibidas, ni se cambiará la Biblia, una vez más Puerto Rico será modelo y ejemplo de responsabilidad para otros pueblos.

La Biblia dice en Levítico 18:22 :

No te echarás con varón como con mujer; es abominación.

También dice en Romanos 1:21-28:

- 21. Pues habiendo conocido a Dios, no le glorificaron como a Dios, ni le dieron gracias, sino que se envanecieron en sus razonamientos, y su necio corazón fue entenebrecido.**
- 22. Profesando ser sabios, se hicieron necios,**
- 23. y cambiaron la gloria de Dios incorruptible en semejanza de imagen de hombre corruptible, de aves, de cuádrupedos y reptiles.**
- 24. Por lo cual también Dios los entregó a la inmundicia, en las concupiscencias de sus corazones, de modo que deshonraron entre si sus propios cuerpos,**
- 25. ya que cambiaron la verdad de Dios por la mentira, honrando y dando culto a las criaturas antes que al Creador, el cual es bendito por los siglos. Amén.**
- 26. Por esto Dios los entregó a pasiones vergonzosas; pues aún sus mujeres cambiaron el uso natural por el que es contra naturaleza,**
- 27. y de igual modo también los hombres, dejando el uso natural de la mujer, se encendieron en su lascivia unos con otros, cometiendo hechos vergonzosos hombres con hombres, y recibiendo en sí mismos la retribución debida a su extravío.**

28. Y como ellos no aprobaron tener en cuenta a Dios, Dios los entregó a una mente reprobada; para hacer cosas que no convienen;

No puedo concluir esta ponencia sin antes invitar a toda persona que desee ser libre de los pensamientos impúdicos que atormentan el alma y esclavizan el espíritu que se tornen a Dios quien será amplio en perdonar y restaurar toda su vida.

“ Que Dios dirija a esta Comisión con su sabiduría. ”

Tab G-2



Rodolfo y Magali Font
Pastores

Misión Cristiana Fuente de Agua Viva Pabellón de la Fe

Christian Mission Fountain of Living Water Pavilion of the Faith

LECTURE

Presentation on House Bill 1013 to add a new subsection (7) to Article 71 of the Civil Code of Puerto Rico, as amended, for the purpose of declaring it impossible for people of the same sex to marry.

By: Church - Christian Mission Council Fountain of Living Water

I - Greetings, Hon. Anibal Vega Borges, Chairman,
honorable members of the Civil Law Committee,
lawmakers present, ladies and gentlemen.

II - The position of the Fountain of Living Water
Council

Present before you is the Rev. Rodolfo Font, Apostle Founder of the Council of the Churches of the Source of Living Water and International Chain Director of Radio, Television and Press NCN.

Our institution with all the mechanisms of Christian diffusion in Puerto Rico and abroad is a faithful defender of civil rights throughout the world. We respect everything involving freedom of all human beings. Therefore our appearance at this time does not respond to personal prejudice against homosexuals, lesbians or any other behavior that is not ordained by God.

We are here because we believe it is important to leave knowing that the vast majority of our Puerto Rican society does not share the use and custom of those sexual aberrations.

Our people are a Christian people and although I personally love all our brethren, we strongly condemn their deviant sexual behavior because it is against divine principles and even against nature.

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...To the thirsty I will give from the fountain of the water of life. (Revelation 21: 6)

That which goes against civilization is not a civil right. It is not a divine right that which is against divinity, and it is not a natural law that which is against nature.

One cannot recognize as a right what is crooked, misaligned, immoral, obscene, rude, licentious, lewd, indecent, filthy, aberrant, unchaste, indecent, dysfunctional, and that's what happens within the homosexual act unfortunately.

There has unquestionably been an increase in this type of behavior in our society; but that does not in any way mean it is good or healthy, as neither is the use of drugs, crime and other misconduct.

God condemns this type of activity and, it is also condemned by the healthy conscience, intelligent, awake, full of common sense, and free from moral and spiritual bruises, of every man or woman who respects and loves himself.

Life itself is in total disagreement since you can not procreate as a result of this type of sexual relationship.

Those seeking marriage between same-sex couples must recognize that God, life and nature have not granted this right because it is not a right.

In our Church we have good parishioners who once practiced this behavior but are now redeemed by the blood of Jesus and have a new life and a new standard of conduct in society.

Homosexuality is not a disease or a punishment from God. It is a personal decision that has mostly been influenced by other people or experiences of moral imbalance and these people still have morals. As it is a personal decision there are no excuses for such behavior, because everyone can change.

That's why you representatives of the people, whom God has allowed to legislate so that never in our land will marriage between same-sex couples be permitted, should pass this bill 1013 for the benefit of all and especially our children who will be the adults of tomorrow, so do that they not decide on that behavior.

You have all the moral and spiritual support of every Christian and citizen whose mind has not been surrendered to the passions of the unadjusted gender.

I give at this time the signature of thousands and thousands of people in our Churches, friends and sympathizers in support of this regulation by recognizing the vital importance for a healthy and rewarding life.

With this law will be no doubt or hesitation that in our land never again will God's laws will be passed by unnoticed, nor will the Bible change, and once again Puerto Rico will be a model and example of responsibility for other peoples.

The Bible says in Leviticus 18.22:

You shall not lie with a male as with a woman; it is abomination.

It also says in Romans 1: 21-28:

- 21. For although they knew God, they glorified him not as God, neither were thankful, but became futile in their speculations, and their foolish heart was darkened.**
- 22. Professing to be wise, they became fools,**
- 23. And changed the glory of the immortal God for images resembling mortal man and birds and animals and reptiles.**
- 24. Wherefore God also gave them up to uncleanness through their hearts, to dishonor their bodies among themselves,**
- 25. Who changed the truth of God into a lie, and worshiped and served the creature more than the Creator, who is blessed forever. Amen.**

- 26. For this cause God gave shameful passions; for even their women did change the natural use into that which is against nature,**
- 27. And likewise also the men, leaving the natural use of the woman, burned in their lust for one another, men committing shameless acts with men and receiving in themselves the due penalty for their error.**
- 28. And as they did not consider God, God gave them over to a reprobate mind; to do things which are not convenient;**

I can not conclude this lecture without inviting anyone wanting to be free of lewd thoughts that torment the soul and enslave the spirit, turn to God who will abundantly pardon and restore your life.

"May God direct this Commission with his wisdom."