

Induced Abortion as a Violation of Conscience of the Woman

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A well-known prospective candidate for President of the United States recently was quoted as saying, “If it is her choice to abort, it’s a matter between her, her doctor, her family and *her conscience and her God.*”¹ (emphasis added). This is not the first time that individuals or institutions have tried to rationalize abortion by reference to conscience. A Protestant denomination has declared that the right to have an abortion is a necessary pre-requisite to the exercise of conscience and urges its congregations and individual members to affirm women’s ability to make responsible decisions, whether the choice be to abort or to carry the pregnancy to term. In *Planned Parenthood v. Casey*² decided by the U.S. Supreme Court in 1992 which affirmed *Roe vs. Wade*, the Court attempted to establish abortion as a liberty protected by the Constitution by appeal to conscience. The court stated: “the abortion decision may originate within the *zone of conscience* or belief... The destiny of the woman must be shaped to a large extent on her own conception of her *spiritual imperatives* and her place in society.” (emphasis added)

The Court in *Planned Parenthood v. Casey* was engaging in pure speculation when it declared that the abortion decision may represent a decision based on conscience or spiritual imperatives. In fact, there was no evidence in the record to support the assertions and the Court cited none in its Opinion.

The Court thus never took into account the possibility that the abortion decision violates the conscience of women. Nor did it consider that, although religious beliefs are absolute, acts or practices motivated by religious beliefs, if they kill or injure another, are subject to regulation by the state.

As will be seen in the following discussion, the abortion decision violates the conscience, at least of most women, and does not represent a spiritual imperative.

What is Conscience?

In order to demonstrate that abortion violates the conscience of women, it is necessary to determine what conscience means.

I. Court Decisions

Court decisions are helpful in understanding the meaning of conscience. For example, in *United States v. Kauten* (1943)³, the U.S. Court of Appeals stated:

Religious belief arises from a sense of the inadequacy of reason as a means of relating the individual to his fellowmen and to his universe... It is a belief finding expression in a conscience which categorically requires the believer to disregard elementary self-interest and to accept martyrdom in preference to transgressing its tenets.

Cases of this type reflect the view that religious belief is the basis for conscience.

Other courts may rely upon respected philosophical authority to determine the meaning of conscience. For example, in *United States vs. Nordolf* (1971)⁴ a draft board attempted to order a person who claimed to be a conscientious objector to report for induction into military service without considering the claims of conscience of the draftee. The court discussed the meaning of conscience at length and stated:

The dictates of conscience are involuntary and compulsory and outside the control of the holder of the beliefs. We can perhaps control our thinking concerning whether and to what extent a moral duty exists prior to the operation of conscience on a moral issue. We can also control, when faced with the moral issue, whether or not to follow the dictates of conscience. But... when a moral issue presents itself and demands action, then conscience speaks involuntarily and inevitably.

The U.S. Supreme Court has recognized that

...conscience and belief are the main ingredients of First Amendment rights... conscience is often the echo of religious faith. But... it may also be the product of travail, meditation or sudden revelation related to a moral comprehension of the dimension of a problem, not to a religion in the ordinary sense.⁵

Conscience only rarely fully coincides with a standard derived from the society or community

An example of conscience not based upon religious belief was recognized by the U.S. Supreme Court in connection with a refusal to kill human beings. In *Welsh vs. United States* (1980)⁶, the U.S. Supreme Court granted a conscientious objector an exemption from military service on the basis of conscience. The basis of Welsh's conscientious beliefs is found in these words:

I believe that human life is valuable in and of itself; in its living, therefore I will not injure or kill another human being. This belief (and the 'duty' to abstain from violence toward another person) ... is essential to every human relation.

II. Eminent Authorities.

Origen, a theologian of the early Christian Church defined conscience as a correcting and guiding spirit accompanying the soul, by which it is led away from evil and made to cling to good.⁷ German philosopher Georg Hegel has stated that true conscience is the disposition to will what is absolutely good.⁸ Psychologist Abraham Maslow defines intrinsic conscience as the necessity of being true to one's inner self and not denying it out of weakness or for special advantage.⁹

True conscience is the disposition to will what is absolutely good

Jewish theologian Martin Buber defines conscience as the capacity and tendency of man to distinguish between those of his past and future actions which should be approved and those which should be

disapproved. Conscience only rarely fully coincides with a standard derived from the society or community.¹⁰ Catholic theologian Thomas Aquinas observed that conscience implies the relation of knowledge to something applied to an individual case... conscience is said to witness, to bind, to stir up, and also to accuse, torment or rebuke.¹¹

A Violated Conscience is Recognized by Personal Guilt, Remorse, or Regret

Influential elements of modern society believe that guilt is merely relative, but fail to recognize that conscience has an intrinsic aspect not derived from external influences. Jewish theologian Martin Buber points out that guilt is not simply acquired from transgressing ancient taboos or social customs or law or parental values. He states:

There exists real guilt, fundamentally different from all the anxiety-induced bugbears that are generated in the cavern of the unconscious. Personal guilt, whose reality some schools of psychoanalysis contest and others ignore, does not permit itself to be reduced to the trespass against a powerful taboo. Each person stands in an objective relationship to others,... it is that persons share in the human order of being, the share for which that person bears responsibility. This responsibility or share in the human order is the action demanded by conscience.¹²

Thus, there is a moral accountability which is objective and not subjective, intrinsic and not determined by opinion polls, court decisions or social customs.

The responsibility or share in the human order is the action demanded by conscience

However, in more recent times psychology has emphasized adjustment instead of goodness.¹³ Abortion counseling, by omitting discussion on the morality of abortion, its emphasis on empathy toward the women and effective contraceptive usage¹⁴ is an example of the adjustment approach. This is consistent with the therapeutic model where terms such as free will, guilt, good or evil have no place.¹⁵

Psychiatrist Paul Tournier laments the modern loss of conscience. He writes:

Modern man thinks he has eliminated the world of values, the world of poetry, the world of moral consciousness; but he has only repressed it and is suffering from it, ... our materialistic and amoral civilization no longer answers the deepest needs of the soul ... Modern man suffers from a repression of conscience.¹⁶

Modern man suffers from a repression of conscience

The attempt to eliminate guilt has been one of the goals of modern society. One author said: "Guilt feelings are a contagious disease that harms those who harbor them and endangers those who live close to them. The liberation from guilt spells the dawn of autonomy."¹⁷

However, other contemporary therapists have recognized guilt or remorse and its significance. Dr. Willard Gaylin, a psychotherapist and author of a book entitled *Feelings: Our Vital Signs* (1979), has stated that,

...contrary to the tenets of pop psychology, guilt is hardly a useless emotion...Guilt...the sense of anguish that we have fallen short of our own standards, is the guardian of our goodness. It is

necessary to the development of conscience in our children and to the avoidance of antisocial behavior...The failure to feel guilt is the basic flaw in the psychopath, who is capable of committing crimes of the vilest sort without remorse or contrition ...Guilt results when we betray an internalized model of behavior.¹⁸

Abortion Often Violates the Conscience of the Woman

Abortion is an action that many women disapprove. There is personal guilt experienced, following induced abortion, even in the absence of societal or legal prohibitions against it. Following legal abortion, women may experience depression on the perceived date of the child's birth, anger at not receiving accurate information prior to the abortion, resentment at manipulation by others, increased sexual activity in an attempt to atone for the destruction of the aborted child by having another replacement child. Women may contemplate or attempt suicide following abortion. Some women will initiate or expand their use of alcohol or drugs. Any of these symptoms are indications that these women fell short of their own standards.

Ambivalence, guilt, anger and deep confusion are major themes of abortion decision-making

Perhaps the most important evidence that abortion decision-making is not a decision of conscience or spiritual imperatives, is found in a comprehensive article entitled Abortion Counselling¹⁹ written by Uta Landy, the former executive director of the National Abortion Federation, one of the foremost advocates of abortion. The study on abortion decision-making indicates that women most often are in the midst of a major personal crisis in the face of an unplanned pregnancy and deny their conscience. The article examines the various behavior patterns of women who seek abortion. Ambivalence, guilt, anger and deep confusion are identified as "major themes" that consistently arise in abortion decision-making. These themes are strong indications that, for most women, the decision to abort, most likely represents a violation of conscience or ideals.

Landy identifies four types of reactions of women in a crisis situation. These include the "spontaneous approach" in which the woman makes the decision quickly without thinking too long about it. Landy warns that while this approach produces a quick resolution, the decision and its consequences might result in regret later.

A second type of reaction to a crisis is the "rational-analytical" type in which the woman weighs her options carefully. But this type of woman is so pre-occupied with being rational that she fails to take her emotions into account.

A third type is the woman who takes the "denying-procrastinating" approach in which she initially denies she is pregnant and once she accepts that she is pregnant has many reasons why she cannot make a decision.

Fourth, there is the "no-decision making" approach in which case the woman refuses to make a decision herself and instead allows others, such as her husband, boyfriend, parents, doctor or counselor to make the decision for her. She consequently refuses to take responsibility for the decision and is prone to blame others for having the abortion. She is also identified as a likely candidate for serious regrets later on. Women who make decisions to abort without adequate reflection or are overly rational or who engage in procrastination and denial or let others decide are likely to leave their own moral or religious values behind in the process.

There is other evidence, based upon the typical thought processes of women who obtain abortions, that conscience or spiritual imperatives are not controlling the decision to abort. For example, in a study of women who had abortions at a Baltimore area clinic in 1983-85, it was found that 2 out of 3 exhibited a histrionic

personality, 1 out of 3 was narcissistic and nearly 1 out of 4 had an anti-social personality.[20](#)

Histrionic individuals are prone to denial, may display rapidly shifting and shallow emotions and will likely overreact to situations when they arise. Usually they tend to show little interest in careful analytic thinking and tend to be easily influenced by others or by fads. The narcissistic personality is characterized by extreme self-centeredness or self-absorption. Anti-social personalities frequently engage in unlawful acts, are irritable and aggressive, often fail to plan ahead or are impulsive, lack regard for the truth and are reckless regarding their or others' personal safety. Women who overreact to situations, who are easily influenced by prevailing attitudes of others or are extremely self-centered or anti-social do not appear to be exercising their conscience, or obtaining abortions as a result of "spiritual imperatives".

In an interview with Magda Denes, clinical psychologist and author of *In Necessity and Sorrow*, a book on abortion in which she interviewed many women involved in abortion, she was asked the question: "Do you think women as a whole experience guilt from an abortion?" She responded: "It depends very largely on the background of the particular woman. Those who are very religious, in whatever religion - Jewish, Catholic or anything else - tend to experience more guilt because most religions forbid abortion. Those who are less religious, or more 'sophisticated', or have formed their own lives by a different philosophy, tend to experience less guilt."[21](#)

Ellen W. Freeman, a researcher at the University of Pennsylvania, found that most women experience ambivalence toward abortion, which continued after abortion, took place. Subsequent to the abortion, 65% of the women "didn't know" if they would choose abortion again if unwanted pregnancy occurred. Only 22% believed they would do so; 13% stated they would have an unwanted pregnancy. Anxiety and depression were strongly related to the pregnancy and even after four months, slightly less than one half reported coping sufficiently well with their negative feeling to describe the experience as resolved.[22](#)

Further, recent studies have shown that a large number of U.S. women who have obtained abortions express guilt or regret, particularly over the long term. A 1989 random telephone interview study of 2533 women was conducted by the Los Angeles Times. Among these women, 7% admitted to having at least one abortion, and of these, 56% expressed a sense of guilt about having had an abortion, and 26% of the women said they now "mostly regretted" the abortion.[23](#) A study of 344 post-abortion women, approximately 6 years after their abortion, who were receiving a variety of services at Akron Pregnancy Center during 1988- 1993 found that 66% expressed guilt from the abortion.[24](#)

The majority of women express guilt feelings from abortion

Non-randomized long-term studies of women, stressed or traumatized by abortion, have found very high percentages of women expressing guilt feelings. In a 1987 study of members of Women Exploited by Abortion, 91% expressed guilt when interviewed about 11 years later.[25](#) A 1990 study by a Minneapolis, Minnesota, based post-abortion support group among religiously oriented women, some 10-15 years post-abortion, found that 90% expressed guilt from their abortion.[26](#) A 1989 study of 232 women, seen at various crisis pregnancy centers in 39 States, who exhibited evidence of some post abortion-stress, found that virtually all had guilt feelings from abortion.[27](#)

The women ask themselves "Why care?" in a world where the strong end relationships

In another frequently cited study by Carol Gilligan, comparing Kohlberg's theory of justice in contrast to the values considered by women both before and after abortion, it was found that nihilism was an important aspect of the thinking process as revealed in their personal stories. She observed that women frequently seemed to

want separation but also attachment. They tended to recast the moral judgment from a consideration for the good to a choice between two evils. Moral dilemmas were seen in terms of conflicting responsibilities. The women asked themselves, "Why care" in a world where the strong end relationships. The author concluded that the abortion decision centers on the self. The concern is pragmatic and the issue is survival. The woman focuses on taking care of herself because she feels that she is all alone.²⁸

Several other studies have also confirmed that the abortion decision may be severely conflicted as indicated by high levels of pre-abortion stress, guilt or anger or self-reproach or anticipatory grief.²⁹

Contemporary abortion counseling frequently breaks down the ideals of women

Another factor in breaking down the ideals of women is found in contemporary abortion counseling techniques. These abortion-counseling techniques make little or no effort to encourage the woman to examine her conscience. These techniques almost exclusively focus on self-centered concerns of the woman. Potential risks and benefits, if discussed at all, omit any reference to moral or religious values. The presence of another being is downplayed or omitted entirely. A review of various informed consent-forms of abortion clinics reveal the consistent use of terms such as "tissue" or "products of conception" to attempt to keep the focus of the woman on herself. The failure to accurately describe exactly what is being removed, has been criticized as a deprivation of informed consent and a moral decision by the doctor, on behalf of the woman.³⁰ This sole appeal to the autonomous self has also been criticized as "almost guaranteeing the breakdown of higher ideals into a rationalization of selfishness permeated with narcissism".³¹

Possible psychological problems, including guilt, regret or remorse, following abortion receive little attention in abortion counseling and, when they are discussed are misleading and inaccurate. For example, in a handout at a Planned Parenthood affiliate on "Facts About Early Abortion", the information is primarily limited to a brief description of how the abortion is done, with possible problems limited to possible bodily injury or future reproductive problems. Under a section entitled "Emotional Problems" it states that "emotional problems after abortion are uncommon, and when they happen they usually go away quickly. Most women report a sense of relief, although some experience depression or guilt. Serious psychiatric disturbances (such a psychosis or serious depression) after abortion appear to be less frequent than after childbirth." Although guilt is acknowledged as a possibility, it is trivialized and emotional problems are greatly understated.

Another informational handout used by an abortion facility entitled Voluntary Interruption of Pregnancy Aftercare, includes a section on "Feelings After the Abortion". It states:

What's important for us to realize is that positive, negative, ambivalent feelings are natural after an abortion. Any of the negative or confused feelings tend to pass away with time. We need to accept them as part of us, and not put ourselves down for having them... It is possible, though rare, to have a few days of depression. This maybe due to hormonal changes that take place in our body when a pregnancy ends, whether by abortion, miscarriage, or full-term delivery.

The sole appeal to the autonomous self almost guarantees the breakdown of higher ideals into selfishness and narcissism

Isolation of the woman by treating abortion as her personal and private choice also fails to adequately take into account, that women involved in decisions regarding abortion are often in a crisis situation. One of the worst things a person in a crisis can do is become isolated. Isolation often leads to bouts of depression and self-pity, and loss of self control, and may result in primitive methods of coping behavior, in an attempt to resolve the crisis.³² Persons in crisis are also very susceptible to the influence of others who may try to aid in resolving the

crisis. Thus, with a minimal effort on the part of the counselor, mental health professional, or family member, a maximum amount of leverage may be exerted upon the individual. However, the values of the one seeking to help may predominate in the process.³³

Abortionists may also manipulate the women into obtaining an abortion by appealing to her fears. This is done by identifying a predominant fear and then using that fear to gain compliance and “sell” another abortion. Examples may include a fear that parents or husband may find out that she is pregnant, fear of interruption of school or career plans or fear of death. This also tends to undermine the conscience of women.

Abortion clinics may also prominently display pro-abortion slogans on their walls in a waiting room, and provide literature from groups such as Catholics for Free Choice, in a deliberate attempt to erode and undermine any existing religious precepts and idealistic values, which may be different from a decision for abortion.

Abortion Decision Making is Pragmatic

The reasons given by women for having abortions also provide evidence that the decision is not based on conscience. A 1987-88 survey, by the Alan Guttmacher Institute, of 1900 women at various abortion facilities throughout the United States, found that the most important reasons for obtaining an abortion were:

1. woman is concerned about, how having a baby would change her life,
2. woman can't afford baby now,
3. woman has problems with relationship or wants to avoid single parenthood,
4. woman is unready for responsibility,
5. woman is not mature enough, or is too young to have a child.³³

All of the reasons given in the survey were pragmatic in nature, none referred to religious or spiritual reasons, and all involved the dissolution or avoidance of human relationships. The reasons are far removed from God or a religious impulse and instead appear motivated by self-interest or weakness, or to obtain a personal advantage.

“If it's legal, it must be all right”

The fact that induced abortion is legal is an important influence on the decision to have an abortion. In a study of 252 women members of Women Exploited by Abortion, published in 1987, 70% said the law had played a major role in their moral perception of abortion, only 6% said it played a moderate role and 13% said it played little or no role. When these same women were asked whether or not they would have sought an illegal abortion if a legal abortion had not been available, 75% said they definitely would not have sought an illegal abortion.³⁴ Similarly, in a study of 344 post-abortion women who were receiving a variety of services at Akron Pregnancy Services in Akron, Ohio from 1988- 1993, 91% reported legal abortions and only 5% reported illegal abortions. When asked if they would have illegal abortions, only 12% said yes, 58% said no and 30% had no response.³⁵ Thus, according to the self-assessment of the women, they were far less likely to have an illegal abortion compared to a legal abortion.

Mental Health is Dependent Upon a Good Conscience

Dr. O. Hobart Mowrer, formerly Research Professor of Psychology at the University of Illinois, declares unequivocally that mental health and real happiness come only to those who have a good conscience. He

states,

Just so long as a person lives under the shadow of real, unacknowledged, and unexplained guilt, the person cannot (if they have any character at all) 'accept themselves'; and all our efforts to reassure and accept them will avail nothing. They will continue to hate themselves and to suffer the inevitable consequences of self-hatred. But the moment they (with or without assistance) begin to accept their guilt and their sinfulness, the possibility of radical reformation opens up; and with this, the individual may legitimately, though not without pain and effort, pass from deep, pervasive self-rejection and self-torture to a new freedom of self-respect and peace.[36](#)

Psychiatrist M. Scott Peck also supports the idea that good mental health is derived from a good conscience.

All adults who are mentally healthy submit themselves one way or another to something higher than themselves, be it God or truth or love or some other ideal... They believe in what is true rather than what they would like to be true... to a greater or lesser degree all mentally healthy individuals submit themselves to the demands of their own conscience.[37](#)

Conscience as a Human Right

The Universal Declaration of Human Rights, adopted in 1948 by the United Nations, recognizes that the right of conscience is part of the dignity of the individual.[38](#) Thus, a violation of conscience violates the basic rights and human dignity of the woman.

Footnotes

1. National Right to Life News, October 11, 1995, p.2, quoting Colin Powell interviewed on Barbara Walters 20/20 program [[Back](#)]
2. Planned Parenthood v. Casey, 112 S. Ct., 2791 (1992) [[Back](#)]
3. United States vs. Kauten, 133 F2d. 703,708 (2nd Cir 1943) [[Back](#)]
4. United States vs. Nordolf, 440 F2d. 840, 843-844 (C.A.III 1971) [[Back](#)]
5. Gillette vs. United States, 401 U. S. 437, 465 (1971) (J. Douglas dissenting) [[Back](#)]
6. United States v. Welsh, 398 U.S. 333, 343 (1970) [[Back](#)]
7. "Commentary on Romans 2:15", (PG. 14, 892), Quoted in Great Books of the Western World, Robert M. Hutchins, Ed. Thomas Aquinas: I. Summa Theologica, Encyclopedia Britannica, Inc. (1952) p.48 [[Back](#)]
8. The Philosophy of Right, Georg Hegel, William Benton, Publisher, Encyclopedia Britannica, Inc. (1952) p.48 [[Back](#)]
9. Toward a Psychology of Being, Abraham Maslow, Princeton: F. Van Nostrand Co. (1962) [[Back](#)]
10. "Guilt and Guilt Feelings, Martin Buber", Proceedings of the International Conference on Medical

Psychotherapy, Vol.III, International Conference on Mental Health, London, 1948, New York Columbia University Press (1948) [\[Back\]](#)

11. "Thomas Aquinas, Vol. I, Summa Theologica", Great Books of the Western World, Robert M. Hutchins, Ed, Encyclopedia Britannica, Inc (1952) p. 426 [\[Back\]](#)

12. Buber op. cit. [\[Back\]](#)

13. Conscience and Guilt, James A. Knight, Appleton-Century-Crofts: New York (1969) [\[Back\]](#)

14. "Abortion Counselling. A New Component of Medical Care", Uta Landy, Clinics in Obstetrics and Gynecology, 13(1); 33, March,1986 [\[Back\]](#)

15. "Characteristics of the Therapeutic State" from The Right to be Different: Deviance and Enforced Therapy , Nicholas Kittrie (1971) p. 39 [\[Back\]](#)

16. The Whole Person in a Broken World, Paul Tournier, (1964) p.11 [\[Back\]](#)

17. Without Guilt and Justice, Walter Kaufman, Delta Books (1973) p. 114 [\[Back\]](#)

18. Feelings: Our Vital Signs, Willard Gaylin, Harper & Row: New York (1973) as quoted in Minneapolis Star Tribune, Jan 1, 1984, p. 12F [\[Back\]](#)

19. Abortion Counselling. A New Component of Medical Care, Uta Landy, Clinics in Obstetrics and Gynecology, 13(1); 33, March,1986 [\[Back\]](#)

20. The Long Term Psychological Effects of Abortion, Catherine Barnard, Institute of Pregnancy Loss: Portsmouth, NH (1990) [\[Back\]](#)

21. "The Abortion Dilemma: Psychological Effects", interview of Magda Denes. Today's Student, Vol. 2, No. 24 (1979); see also Necessity and Sorrow, Magda Denes, Penguin Books: New York (1976, 1977) [\[Back\]](#)

22. Abortion: Subjective Attitudes and Feelings, Ellen W. Freeman, Family Planning Perspectives, 10(3): 150,May/June, 1978 [\[Back\]](#)

23. "Many in Survey Who Had Abortion Cite Guilt Feeling's", George Skelton, Los Angeles Times, March 19, 1989, p.28 [\[Back\]](#)

24. "Physical and Psychological Injury in Women Following Abortion: Akron Pregnancy Services Survey", Lee E.H. Gsellman, Association for Interdisciplinary Research Newsletter, 5(4): 1-8, Sept/Oct 1993 [\[Back\]](#)

25. A Survey of Post-abortion Reactions, David Reardon, Elliot Institute for Social Sciences Research: Springfield, IL (1987) [\[Back\]](#)

26. Post Abortion Trauma, 9 Steps to Recovery, Jeanette Vought, Zondervan: Grand Rapids, MI (1991) [\[Back\]](#)

27. Canonical Variates of Post-Abortion Syndrome, Helen P.Vaughan, Institute for Pregnancy Loss:

Portsmouth, NH (1990) [[Back](#)]

28. In a Different Voice: Psychological Theory and Women's Development, Carol Gilligan (1982) p. 74 [[Back](#)]

29. See: "Women Undergo Personality Changes Prior to Abortion" in "Personality Characteristics of Women Who Had Induced Abortions", Association for Interdisciplinary Research Newsletter, 4(3): 7-8, Spring, 1992 [[Back](#)]

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36. "Sin, The Lesser of Two Evils", O. Hobart Mowrer, American Psychologist, May 1960, p. 301-304 [[Back](#)]

37. The People of the Lie, M. Scott Peck, Simon and Schuster: New York (1983), p. 76, 78 [[Back](#)]

38. Universal Declaration of Human Rights adopted by United Nations in 1948, as quoted in Religious Liberty and Conscience, Milton R Konvitz, The Viking Press (1968), p. 100 [[Back](#)]