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1314 Betasso Drive
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The Honorable John G. Roberts, Jr
Chief Justice of the United States
The United States Supreme Court
One First Street N.E.
Washington, DC 20543

Re: Overturning Roe v Wade and the Normalization of Anti-Semitism

“Abortion bans place greater value on the life of the fetus than on the pregnant person, a violation of both Jewish law and tradition and of American religious liberty.” National Council of Jewish Women, June 24, 2022 (1).

Summary. In overturning Roe v Wade (Roe) the United States Supreme Court opened the door for the violation of two First Amendment protections. The first is the Establishment Clause as multiple states have codified into law minority conservative Christian beliefs, forcing citizens to live their lives under those religious beliefs, and where it is clear that those underlying beliefs have no basis in fact. As a result, anti-abortion laws, that are not supported by a preponderance of medical organizations, have been enacted that have subjected citizens in multiple states to what can best be described as absurdities, adversely affecting the lives, health and well-being of women (and their families) in our country. The second is the Free Exercise Clause. Overturning Roe not only resulted in prohibiting the Free Exercise of an element of Jewish law and tradition (even criminalizing such) but also placed the Jewish population at increased risk of anti-Semitic violence by aligning the Jewish faith with the extremist view of “baby murder”, a view at the heart of anti-abortion violence. Although many articles have been published about the violations of religious freedom resulting from this Supreme Court decision, little has been published as to how this decision enabled anti-Semitism, a hatred that was front and center before these Justices prior to their ruling. This correspondence draws into question as to how Supreme Court Justices could not have been aware of the anti-Semitic and potentially life-threatening implications of their decision to overturn Roe. An investigation, by an independent third party, is called for to determine whether these justices, in overturning Roe, knowingly violated First Amendment protections and thus served as enablers of anti-Semitism having potentially life-threatening consequences to members of the Jewish faith. Should it be shown that these Justices were aware of these consequences at the time they ruled to reverse Roe, it is further argued that the principle of Judicial Immunity should not protect these Justices.

Dear Chief Justice Roberts:

In June of last year, I issued correspondence to you and all members of the Court prior to the *Dobbs v Jackson Women's Health Organization* (hereafter *Dobbs*) ruling, a ruling that subsequently resulted in the decision to overturn *Roe v Wade* (hereafter *Roe*). In the opinion written by Justice Alito, the abortion debate was markedly changed by inserting "unborn human being" in place of the language used in the *Roe* ruling – "potential life" (2). It is understood the Court has not been directly involved in the enactment of abortion restriction laws at the state level, but its decision to overturn *Roe* opened the door for extremist, conservative Christian beliefs to be codified into law that not only adversely affected the social status, health and well-being of women but also introduced religious discrimination, most notably against the Jewish faith, where the free exercise of an element of Jewish tradition and law was prohibited and even criminalized.

Since the issuance of my June 4, 2022 correspondence, and the Court's subsequent decision to overturn *Roe*, it has become clear that the objections to *Roe* were heavily influenced by conservative Christian religious beliefs (held by a minority of Christians), a decision that was criticized by multiple medical organizations, including those that provide care to infants. In that prior correspondence I raised concerns that overturning *Roe* would lend credence to, and even embolden, those who held the belief that abortion represented the murder of an "unborn baby". Christopher Wray, FBI Director, has given testimony before the Senate Judiciary Committee that abortion-related violence, by both abortion-rights and anti-abortion advocates, has surged since the Supreme Court overturned *Roe* (3). Both the FBI and DHS recognize abortion-related violence as fitting the definition of domestic terrorism – a person committing such an act being labelled a Domestic Violent Extremist (4). This creates a grave circumstance for Jews in this country as the *Roe* reversal has aligned their religion with the extremist view of "baby murder", a view that is at the heart of anti-abortion violence. Thus, for the Jewish population, the most targeted religion in the US and a religion that has all too often served as a convenient scapegoat for extremist views, anti-abortion violence crosses over into anti-Semitic violence that is already occurring at historic levels in our country.

This correspondence is divided into three sections. The first two represent a follow-up to the prior correspondence I issued to the Court. The first deals with a number of lines of evidence supporting that the reversal of *Roe* was heavily influenced by conservative Christian religious beliefs. The second examines, through the lens of our current knowledge base, how anti-abortion laws based on religious beliefs have resulted in what can best be described as absurdities that have been thrust upon citizens of our country. The final section examines the links between the reversal of *Roe* and anti-Semitism. It raises the question as how the Justices who overturned *Roe* could not have been aware of the anti-Semitic implications, both discrimination and potentially life-threatening violence, of their ruling.

The Overt Linkage of Overturning Roe to Fundamentalist Christian Beliefs

There are at least four lines of evidence that the decision to overturn Roe is overtly linked to conservative Christian religious beliefs. These are summarized below.

1. Condemnation of the Decision by Multiple Medical Organizations

Multiple medical organizations objected to the ruling, and in at least one case (AMA) 'condemned' the decision (8). It is held in medical practice that the right to abortion is a necessary and integral part of reproductive healthcare. It defies logic that branches of medicine dedicated, in part, to the health and well-being of infants (e.g. American Academy of Pediatrics and American Academy of Family Practitioners) would object to a ruling that would result in laws protecting the life of an 'unborn baby'.

- The American Medical Association condemned the ruling and posted the following statement: “[The American Medical Association] condemns SCOTUS’s decision to overturn nearly a half century of precedent protecting patients’ right to critical reproductive health care – representing an egregious allowance of government intrusion into the medical examination room.”
- The American Academy of Pediatrics issued the following statement – “This decision [overturning Roe] carries grave consequences for our adolescent patients, who already face many more barriers than adults in accessing comprehensive reproductive healthcare services and abortion care.”
- The American Academy of Family Practitioners issued the following: “#SCOTUS decision criminalizes medical care, undermines patient-physician relationship and exacerbates health inequities.”
- The President of the American College of Obstetrics and Gynecology, disciplines dedicated to female reproductive health and assisting women in bringing life into this world, issued the following: “Today’s decision is a direct blow to bodily autonomy, reproductive health, patient safety, and health equity in the United States.”

Multiple other medical organizations have issued similar opinions. The opinion that personhood is established at conception, or at some early point in pregnancy, is not one held by a preponderance of medical organizations.

2. Support from Multiple Faith Leaders on the Decision to Overturn Roe

Diametrically opposed to the opinion of medical organizations, multiple Christian faith leaders issued statements praising the decision to overturn Roe (9). These statements include the perspective that Roe resulted in the deaths of 'innocent children'. Some examples follow.

- Christian evangelist Rev. Franklin Graham issued the following: “The United States Supreme Court just announced one of the most significant rulings in my lifetime – officially voting to overturn the 1973 Roe v Wade decision because it was ‘egregiously wrong from the start’, as stated by Justice Samuel Alito.....Roe v. Wade, passed 49 years ago, has resulted in the deaths of over 63 million innocent children in the country”.
 - Pastor Jentezen Franklin, based in Georgia, issued the following on Fox News Digital: “This [decision to overturn Roe] is a remarkable answer to the prayers of millions of millions of people for decades....We do not gloat or dare say anything but praise to our God for this courageous and just decision by the Supreme Court”.
 - Pastor Lucas Miles at NFluence Church in South Bend, Indiana issued the following: “Praise God. While as Christians we weep for the precious lives that were lost the past 50 years under Roe, we rejoice alongside every witness in heaven over the victory that transpired today for the unborn.”
3. Academicians in the Field of Religious Studies have Recognized the Christian Religious Underpinnings and Discriminatory nature of the Decision to Overturn Roe

The Supreme Court, by replacing ‘potential life’ with ‘unborn human life’ in overturning Roe “...erases whole groups of people who have different religious beliefs” and signals “which religious voices get authority and power in our country.” - Rebecca Todd Peters, professor of religious studies, Elon University (2).

Excerpting from a paper (10) issued jointly by Dr. Peters, Zahra Ayubi (associate professor of religious studies at Dartmouth College, and Michal Raucher (assistant professor of Jewish studies at Rutgers University – New Brunswick) “...an imbalance in media coverage normalizes religious opposition to abortion, thus paving the way for particular theological beliefs to be codified into law. This ultimately denies the right of religious freedom to other faith communities whose beliefs about pregnancy, abortion and childbearing differ. Robust media coverage of Christian opposition to abortion, in particular, has amplified the anti-choice Christian perspective in the public debate. But it’s actually a minority opinion; only 45 percent of all Christians think abortion should be illegal in most or all circumstances.” The research showed that 59% mainline Protestants, 56% Black Protestants, and 52% white Roman Catholics support legal access to abortion in all or most cases. Additionally, 70% of Jews, 51% Muslims, 69% Buddhists, 62% Hindus and 83% Unitarian Universalists support the legality of abortion in all or most cases.

4. Religious background of majority justices in overturning Roe

The overt linkage between Christian religious beliefs and the decision to overturn Roe is further strengthened by the religious background of the justices who reversed Roe. The Supreme Court has an unprecedented Catholic supermajority. Excerpting from an article about the

religious backgrounds of the justices who overturned Roe (11): “The justices who voted to overturn Roe have been shaped by a church whose catechism affirms ‘the moral evil of every procured abortion’ and whose US bishops have declared opposition to abortion their ‘preeminent priority’ in public policy.” These justices come from the conservative wing of Catholicism whose opinion on abortion is different from US Catholics as a whole where the majority believe abortion should be legal in all or most circumstances. Additionally, “...The justices in the Dobbs majority aren’t simply cradle Catholics. Several have ties to intellectual and social currents with Catholicism that, for all their differences, share a doctrinal conservatism and strong opposition to abortion.”

Concluding Comment

In overturning Roe, the Court has violated that long-established precedent and tradition embodied in the First Amendment’s Establishment and Free Exercise Clauses to separate church and state. Not long ago the Supreme Court upheld that tradition in the 1992 Lee v. Weisman ruling

“The mixing of government and religion can be a threat to free government, even if no one is forced to participate.... When the government puts its imprimatur on a particular religion, it conveys a message of exclusion to all those who do not adhere to the favored beliefs. A government cannot be premised on the belief that all persons are created equal when it asserts that God prefers some.”

-- Harry Blackmun, Majority Opinion, Lee v. Weisman, 1992

Resulting Absurdities in Anti-Abortion Laws Based on Religious Beliefs

In my prior correspondence to you and members of the Court, I examined in detail a central Christian religious belief at the heart of the anti-abortion movement (the 4th century doctrine of Original Sin) through the lens of the rapid and remarkable acceleration of technological advancements and information since the mid-20th century. What follows are some of the consequences of the Roe reversal that have been thrust upon citizens of our country.

Prosecution of Women for Abortion vs Natural Human Embryo Mortality

One such example is that women could be held criminally liable for terminating an embryo as an ‘unborn child’, when it is widely accepted that natural human embryo mortality is high, particularly during the first weeks after fertilization (5). Although difficult to estimate, the failure of fertilized eggs to survive to term could be as high as 40-60%. In other words, women could face criminal prosecution for something that the female reproductive system naturally

does on a regular basis. This begs the question, as was raised during the embryonic stem cell debate a couple of decades ago, as to why our Creator would put a reproductive system in place that results in a holocaust of lost innocent lives doomed to eternal damnation or alternatively denied entry into heaven. If it is argued that the termination of life only counts if implantation occurs, then why the religious objections to embryonic stem cell research, or the legal concerns (expressed below) of what to do with unused embryos created during the in vitro fertilization process?

Fetal Heartbeat Anti-Abortion Laws

Another is the implementation of fetal heartbeat laws in some states, such as Georgia, that declare a human life exists when a fetal heartbeat can be detected. As pointed out by Dr. Saima Aftab, medical director of the Fetal Care Center at Nicklaus Children's Hospital in Miami (6), the sound being picked up by ultrasound at around 6 weeks gestation is not a heartbeat but rather the electrical discharge from a piece of tissue that will become the future pacemaker of the heart. A heartbeat at that point cannot be detected by a stethoscope simply because there is no heart – rather, the sound that is heard is manufactured by ultrasound from that electrical discharge. A heart with 4 chambers and connectivity to the lungs does not occur until around 17-20 weeks of gestation, close to the endpoint in Roe of fetal viability outside the womb. As pointed out by Dr. Aftab, “by no means does it [the sound created by ultrasound] translate to viability of the heart” or viability of the pregnancy. This matter actually fits the definition in the original Roe decision (‘potential life’ – in this case a potential human heart) and not ‘unborn human being’ as written by the majority in overturning Roe. Should an electrical discharge from a piece of tissue be sufficient to declare personhood? Many would argue not, but none-the-less citizens have been forced to conduct their lives under that belief. It becomes clear that the declaration of a human heartbeat at 6 weeks is not based on evidence of an actual heartbeat, but rather represents grasping at straws to provide evidence supporting anti-abortion sentiments.

In Vitro Fertilization (IVF) and the Fate of Embryos (7)

Depending how a state defines personhood (as one example, Arkansas defines an “unborn child” as starting at fertilization), concerns have been raised as to whether embryos created during the IVF process could be defined as “unborn children” under law. Thus, would discarding unused embryos from that process constitute homicide, or would shipping embryos across state lines for the purpose of destruction violate law? Dean Moutos, who runs Arkansas Fertility & Gynecology (the state's sole provider of IVF, stated “I don't know whether the people who wrote this law fully understood the downstream effects of it...But everybody across the country, including us in Arkansas, is very concerned about the potential.” Supreme Court Justices Breyer, Sotomayor, and Kagan, in their dissenting opinion, touched on this very matter

writing that “the Court may face questions about the application of abortion regulations to medical care most people view as quite different from abortion,” including IVF.

It becomes difficult to not define the above three examples as being absurdities that adversely affect the lives, health and well-being of women (and their families) in our country. Although individuals in our country have been appalled at the persecution and punishment of women in Iran for not adhering to religious beliefs, in this country the reversal of Roe has resulted in state mandated pregnancy that has denied women autonomy over their own bodies and, for all intents and purposes, relegated them to the status of being incubators. It for this reason that my prior correspondence to the Court argued for a strict separation of Church and State on the abortion matter.

Overturning Roe and Links to Anti-Semitism

A major source for this section is a CNN documentary, “Rising Hate; Anti-Semitism in America” that aired in August, 2022 (12). Where necessary it has been supplemented with other references.

To be clear, there is no attempt in this section to label the Supreme Court Justices who overturned Roe as holding anti-Semitic beliefs. The matter presented here is different from that. Did these justices move forward with their ruling having the knowledge that it would lead to laws that would prohibit, even criminalize, an aspect of Jewish tradition and law as well as increase the risk of life-threatening hate crimes against the Jewish population by aligning the Jewish faith with the extremist view of abortion as “baby murder”? Where the optics on the decision to overturn Roe become troubling are the ties of several of the Justices (either through nomination and in one case a spouse who worked to overturn the 2020 presidential election) to former president Trump, whose record on denouncing anti-Semitism is inconsistent and where anti-Semitic harassment and hate crimes have been out carried by extremists in his name. It is clear that both the Justices and former president Trump had a common goal – the reversal of Roe. But in achieving their objective, did these Justices turn a blind eye to the hatred and anger that was being stoked by the former president?

Anti-Semitism has been called the ‘oldest hate’ (12). Jews are, far and away, the most targeted religious group in America. Paul Abatte, Deputy Director FBI has stated that the “threat level against the Jewish community is historic over the past few years” and holds that anti-Semitism is being normalized in our country. This is a position held by the Anti-Defamation League (ADL) as well. It has found its way openly into political discourse. Although existing on both the Left and Right, it is from the Right where hatred is expressed as blatant harassment and violence in the form of hate crimes directed against the Jewish community.

A recent example of this normalization involves Representative Marjorie Taylor Greene (R-GA). The Jerusalem Post published an opinion piece (13) documenting the numerous times Representative Greene engaged in anti-Semitic language and behavior that represented Holocaust denigration and denial. And as reported in numerous media publications, she took a page out of the thoroughly debunked and conspiracy laden Protocols of the Elders of Zion in claiming that the 2018 California wildfires were ignited by a space laser controlled by a corporate cabal, including the Rothschild banking firm (14). Although such comments would have relegated a political figure to the hinterlands not long ago, Representative Greene has recently been appointed to two powerful Congressional committees, Oversight and Homeland Security, thus inserting her voice and opinions into mainstream politics. She is an ardent supporter of the former president and is reported to have her eyes set on being the former president's running mate in 2024 (20).

Additionally, no attempt is made here to claim that the former president is anti-Semitic. Whether his ties to anti-Semitism are personally held or just political theater in playing to an element of his base is irrelevant to the point of this section. No matter the underlying cause, the linkage of the former president to anti-Semitism becomes indisputable when examined by the marked rise in anti-Semitic incidents both during his candidacy and presidency, as well as anti-Semitic harassment and hate crimes by extremist groups that have been carried out in his name. Just a few well publicized examples follow.

Tied to his candidacy and presidency is a marked increase in anti-Semitic incidents. Prior to 2016, such incidents were in decline. In 2015, 942 such incidents were reported, the year of his candidacy (2016) the incidents jumped to 1267, and in 2021 they numbered 2717, a number that reached historic levels (12).

There is the Charlottesville incident where torch-bearing marchers were not only chanting "Jews will not replace us", but also, less reported, a Nazi nationalist slogan and rallying cry "Blood and Soil" (15). It becomes difficult to understand the former president's defense of White-Nationalist protesters, stating that there were "Some very fine people on both sides".

There is the Julia Ioffe matter, a Jewish reporter who, in doing a piece on Melania Trump during Trump's candidacy, uncovered that she had an illegitimate half-brother in Slovenia. She was subjected to an onslaught of vile anti-Semitic harassment and threats by pro-Trump supporters. During an interview with CNN's Wolf Blitzer, then candidate Trump refused to condemn the behavior, a matter that professor Britton Heller, a human rights activist said not only served as permission but led to an upsurge in anti-Semitic incidents with other Jewish reporters (12).

There is the defacing of a memorial near a Wisconsin synagogue in 2017, just hours before the celebration of Rosh Hashanah, with swastikas and pro-Trump graffiti that included "TRUMP RULES"(16).

And then there is the former president's comment during a presidential debate "Proud Boys, stand back and stand by...". As stated by the ADL's Jonathan Greenblatt, "And in case anyone has any doubts, the Proud Boys are a virulent strain of American right-wing extremism...[with] a long track record of violence...". As published in The Jerusalem Post (17), although "Anti-Semitism is not core to the group's ideology...according to the Anti-Defamation League, the group has allied with White Supremacists, and McInnes (a founder and supporter of the former president) has made a series of antisemitic statements" including "I felt myself defending the super far-right Nazis..." and engaging in overt Holocaust denial. The linkage between the former president and far right white nationalist extremist groups, i.e., Proud Boys and The Oath Keepers, is a matter currently under investigation in the January 6, 2021 attack on the Capital.

With this backdrop, is it possible that the Justices could have been unaware of the marked rise in anti-Semitic incidents prior to the decision to overturn Roe? Highly unlikely as Professor Deborah Lipstadt, Emory University, a preeminent authority on anti-Semitism, was elevated to an Ambassador level position, Special Envoy to Combat and Monitor Anti-Semitism, sworn into the position by Vice President Kamala Harris on May 24, 2022, just a month preceding the decision to reverse Roe. It becomes difficult to see how the issue of anti-Semitism and anti-Semitic violence in our country was not front and center before these Justices prior their ruling.

Concluding Comments

A Tainted Court

The optics of the decision to reverse Roe are troubling. Three of the Justices who ruled to reverse Roe were appointed by former president Trump who had a clear political objective to overturn Roe. Two of them (Justices Kavanaugh and Barrett) accepted the nomination after the President's defense of White Nationalists at Charlottesville who were chanting anti-Semitic slogans. Another (Justice Thomas), who represented the sole dissenting vote regarding the obligation of the former president to turn over documents to the January 6 Committee (19), has a spouse who was in communication with Trump's Chief of Staff and state officials in attempts to overturn the 2020 presidential election. At the time of the decision to reverse Roe, all five Justices in the majority did so with the former president's record of inciting anti-Semitic hatred and violence in plain view.

A Call for Investigation and the Issue of Judicial Immunity

Although the public is not privy to deliberations between the Justices, it becomes difficult to imagine that the discriminatory nature of overturning Roe would not have been addressed. Would not Justice Elena Kagan, who is of the Jewish faith, have addressed this?

The issue in question here is whether the five Justices who reversed Roe did so with knowledge of the anti-Semitic consequences such a ruling would wreak upon those of the Jewish faith. There are two points here. The first is whether there was pre-existing knowledge that overturning Roe would result in laws prohibiting the Free Exercise of an element of Jewish law and tradition, even criminalizing such. The second is whether there was pre-existing knowledge that replacing 'potential life' in Roe with 'unborn human being' would align the Jewish faith with the extremist view of abortion as 'baby murder', a view central to anti-abortion violence, thus moving anti-abortion violence into the realm of anti-Semitic violence.

These issues are worthy of investigation. However, as was witnessed with the 'Alito draft opinion leak' investigation, the Court did not show itself capable of thoroughly investigating itself. In this current matter it would be important that the Justices themselves be included in the investigation. As such, an independent third party should be assigned.

Finally, should Judicial Immunity be considered applicable if it can be shown that these justices moved forward understanding the discriminatory and potentially life-threatening consequences of their ruling? At least in the view of this citizen, it should not.

The statements by Justice Sotomayor during the Dobbs hearing proved prophetic regarding the loss of public confidence in the Supreme Court. During those hearings, Justice Sotomayor urged her conservative colleagues to follow precedent, not politics. "Will this institution survive the stench that this [tossing out the landmark ruling establishing abortion rights] creates in the public perception that the Constitution and its reading are just political acts? I don't see how it is possible" (18).

Fundamental rights are a national matter, not a state matter. In my work defending rights, deferring to states is simply code for discrimination, a tactic to enable discrimination. Such has been the case in the fight for rights in our Black and LGBTQ communities. By deferring to states in the decision to overturn Roe, the highest court in our land has extended that deplorable tactic to include both women and members of the Jewish faith. The outcomes of their decision, as detailed in this correspondence, were inevitable.

Respectfully submitted,

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CC: Justice Sonia Sotomayor
Justice Elena Kagan
Justice Ketanji Brown Jackson

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