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“I took up the case of the stranger”: Arguments from Faith, History and Law

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It may seem surprising that faith groups would offer sanctuary to refused refugees, or material support to undocumented migrants. These acts of resistance and compassion require normally law-abiding moral people to make a conscious choice to defy government and perhaps, if necessary, even break the law. The success of sanctuary movements (defined broadly here) relies on broad public support both to attract willing collaborators, and to forestall government intervention. Previous studies have examined the discourse around sanctuary practice, and the ensuing public debates. This chapter adds to this body of work by offering an empirical study of how individuals and groups publically justified acts of sanctuary; we offer a comparative analysis of these claims in Canada, the United States and the United Kingdom; and finally we attempt to respond, in a limited way, to the challenges raised by these voices. The jurisdictions considered share similar legal, faith and cultural histories, but we seek to understand how their distinct political and geographic contexts shaped their movements. We find that sanctuary practice, and even its very definition; vary widely across these jurisdictions, from shelter in a church, our traditional conception, to rescue in the wilderness. We also discover that sanctuary supporters we heard share a common motivation, and perhaps for those from a Christian worldview, a theological commitment broad enough to encircle all these expressions.

Note on Method

In order to capture a snapshot of the public discourse on sanctuary, we conducted a thematic analysis of English language newspaper articles accessible through the *Factiva News* database published since 1980 in the three jurisdictions. *Factiva* archives major news sources, and at the time of the search included 26 U.K., 39 U.S. and 6 leading Canadian sources. The periodicals included would have the widest circulation. We chose print media stories, as they appeared to be the primary means to access the general public. We used search terms “asylum” or “sanctuary” and “church” or “mosque” or “temple” and “refugee”. We removed irrelevant / duplicate articles from these results, and then identified direct quotations by sanctuary supporters that offered some justification for their actions. We analyzed these justifications to identify reoccurring themes. The use of print news sources raises concern around journalistic bias and misrepresentation of religious issues (see Haskell, 2009; Marshall, Gilbert and Green-Ahmanson, 2008; but contra Buddenbaum, 2010; Underwood, 2002). Are these the justifications of the sanctuary supporters or merely the media’s construction? That question is outside the scope of this work, but to balance potential news media bias we listened for “echoes” of identified themes in other media such as articles published in church publications since 1980 accessed through the *ATLA Religion Index*, web documents published by sanctuary advocate groups, and finally, court/legislative documents, accessed through the *Lexis-Nexis* legal database. For each jurisdiction we included a section called “Echoes” where we briefly described instances where we heard these themes mirrored outside the news media.

HEARING THEIR VOICES

The United Kingdom

The newspaper accounts we gathered spanned thirty-one years, from 1987 to 2008. There was an even distribution across that span except for a spike of seven stories in 1989. We identified 29 stories that contained specific justifications for the practice of sanctuary and coded 105 quotations. The stories contained voices of clergy and laypeople, Catholics, Protestants, Muslims, and those un-religious. The beneficiaries of sanctuary in these accounts all appeared to be refugee claimants who had been through the refugee process, and who were now under deportation orders without further state assistance. Often, they had developed relationships within the community during the lengthy period when their cases were being adjudicated. Notable at the outset was that these sanctuary practitioners in the UK understood their acts were illegal, and that any sanctuary right had been long abolished. Although several allusions were made to international human rights standards, there were no attempts to suggest these sanctuary acts were in any way legal. Natural justice concepts however permeated their discourse; “when we are faced with laws that we believe are unfair laws, then changing those laws has to be the top priority in a democracy,” (Paterson, 1997) and “I will keep fighting until I win, because justice is on our side.” (Sharratt, 1988)

Moral Outrage

In most stories compassion was a justification. Practitioners saw their acts as basic human kindnesses. A prevalent sub-theme was moral outrage, outrage at what was deemed a broken refugee system, and outrage at how their government handled deportees. The system was often portrayed as unhearing, uncaring and unaccountable, in the face of what practitioners viewed as very real threats to human life and safety. Several accounts alleged systemic discrimination and racism. The argument being built through many news accounts was that these are broken and vulnerable people in need of protection. Where the state was perceived to have failed to provide that protection, communities, and frequently churches were portrayed as having stepped into this role, and in doing so, claimed the higher moral ground.

The conception of the broken system also invoked both puzzlement and anger. In more recent articles, many refugees were also described as positive contributors to society, and consequently their removal was baffling, “Britain’s going to be a better place for them, not a worse place, so I just don’t know what the problem is.” (Stevenson, 2008) There were frequent accounts of positive experiences with refugee claimants clearly intended to rebut negative stereotypes that practitioners felt were often portrayed in the media. In these accounts the U.K. needed the refugee claimants contributions as much as the claimants needed protection.

There was acceptance in many stories that some claimants’ refugee applications will fail, and be deported. The frequent argument here was that the process needed to be more

humane. This is significant, for perhaps the most galvanizing element for these practitioners was how the state dealt with failed refugee claimants. “It was like watching the Gestapo – men with armour, going in to flats with battering rams...I am not going to stand by and watch this happen again.” (Stevenson, 2008) There were frequent accounts of alleged inhumane treatment against deportees, and strong-arm tactics by police. The strong language, alluding to Anne Frank, jack-boots, and the Gestapo, might create a visceral reaction with readers.

Faith

Faith was also a theme, though usually articulated by clergy not lay supporters. One clergy practitioner alluded to the liberation activists of Central America, (Vulliamy, 2006) but voices were more pragmatic than theological. Christian faith was often portrayed as the source of morality in these accounts: “the 69 year old is a committed Christian and believes the choice of ‘leave or starve’ is inhumane.” (Stevenson, 2008) Curiously, the Biblical practice of sanctuary was not invoked in these stories, but rather responsibility to the stranger: “The most important place to find the beginnings of our idea is not in any political action but in the Bible. There is a constant emphasis in the Bible that the stranger, the alien, the friendless is a special responsibility of God’s people.” (Scott, 1996) This idea figured strongly, and was usually portrayed as intrinsic to the calling of the Church: “They are doing what any church should do – giving help to those who need it.” (Paterson, 1997) Heroes of the faith were held up as exemplars, like St. Francis of Assisi, St. Thomas à Beckett, and Jesus Christ: “where else are we to find Jesus if not with the outcast and oppressed,” (Vulliamy, 2006); antitypes such as Kings Henry II and VIII were also noted.

Faith arguments often placed Christian duty at odds with duty to the state, and in those situations Christian duty usually took precedence. This conflict was often framed as merely “fulfilling the law of Christ,” but in several articles it was very explicit:

Christians ought to observe the law and support the state. But ever since New Testament times, Christians have also felt that they also have an obligation to God and that may occasionally come into conflict with the state. When that happens, Christians have found that what, in prayer and conscience, they take to be the will of God, takes precedence over the laws of the state. (Paterson, 1994)

This conscious choice rarely brought the church and state into direct conflict. The reference to English martyr Thomas à Beckett compared Manchester police’s forcible removal of failed refugee Viraj Mendis in 1989, to King Henry’s slaughter of Beckett in Canterbury Cathedral (Miller, 1989). By invoking inflammatory imagery, the state’s violation of sanctuary was paralleled with historical attacks against the English church. Interestingly, the 2002 forcible removal of the Ahmadi family from a mosque, raised questions whether police would have acted similarly in a Christian church (Coyish, 2002).

Echoes

When we considered online documents posted by sanctuary supporters, we, not surprisingly, found more developed and nuanced positions. The plight of refused asylum seekers was addressed in documents from sites such as *General Synods of the Church of England (Christian Responsibility, 2011)*, *Methodist Church (Harvey, 2009a)*, and *Churches Together in Britain and Ireland (Harvey, 2009b)*. In these documents we saw an emphasis on the principles of natural justice, the experiences of individual asylum seekers, and the Church's obligation to assist. These emphases were similar to the expressions in the news stories. A briefing document from the 2009 *Church of England Synod* reminded delegates "to take Deuteronomy 10:19 seriously: 'You shall also love the stranger, for you were strangers in the land of Egypt'" (*Special Agenda, 2009*). These texts offered a fuller articulation of Christian theology around asylum, but also explored human rights obligations in international law. This latter theme was rarely seen in the news stories, but this is not surprising as most sanctuary supporters interviewed were involved at the local church level, and would not be expected to possess an understanding of international humanitarian law.

The United States

We identified 30 news stories falling between 1991 and 2009 containing 84 justifications for sanctuary. It appeared that all speakers were of the Christian faith. The distribution of the news stories reflects the two sanctuary movements of recent U.S. history. Newspaper accounts from 1991 to 1996 are about "The Sanctuary Movement" (SM) of the 1980s. The primary concern of this social movement was the plight of Central American refugees, mainly from El Salvador and Guatemala. One scholar explained the political and social context of the time:

The 1980s mass movement formed in response to the Refugee Act of 1980. During this time, violent wars raged in El Salvador and Guatemala; El Salvador had been engulfed by civil war since 1979, while in Guatemala, 11,000 people were killed in just 1983 alone. Thousands of refugees from these countries fled to the United States seeking political asylum, only to be routinely rejected and deported. The main problem lay with the 1980 Refugee Act, which was supposed to be a fairer version of the refugee policy already existing in the United States, but proved to be quite the opposite. The Act intended to establish a non-ideological standard for refugee and asylum determination, stating that a refugee was "any person" who was "unable or unwilling to return to...that country because of persecution or a well-founded fear of persecution." In reality, someone fleeing a country friendly to the United States was less likely to gain asylum than someone fleeing an unfriendly country, such as one from the Soviet bloc, even if the harms suffered were the same. (Wild, 2009, 3; See also Chinchilla, 2009).

Newspaper accounts from 2001 to 2009 described practices that developed into what is now called the "New Sanctuary Movement" (NSM) (see Yukich and Carminaro-

Santangelo, this volume). This movement arose in response to the treatment of migrant workers and undocumented migrations from Mexico and South and Central America. A 2007 newspaper story covering the formal launch of the new movement, explained:

Churches in a handful of U.S. cities are preparing to launch a “sanctuary movement” to help illegal immigrants stave off deportation, hoping to unite faith-based groups in a push for immigration reform. ...

The movement “will enable congregations to publicly provide hospitality and protection to a limited number of migrant families whose legal cases clearly reveal the contradictions and moral injustice of our current immigration system,” according to the New Sanctuary Movement’s Web site....

The new sanctuary plans come as immigration reform legislation has been stalled since last summer, with Congress split over whether to first strengthen border security and immigration laws or extend a path to citizenship to illegal immigrants. (Prengaman, 2007)

Some stories appearing between 2001 and 2009 are retrospective accounts of the SM. Still others focus on and quote individuals involved in both movements; from individuals in the first movement commenting on the second; or from individuals in the second movement who look to the history and perceived success of the first as a source of inspiration and direction. The newspaper stories reveal an overlap between the two movements in membership, strategy and justifications, a fact commented on by some scholars (see e.g. Wild, 2009; but see Yukich, this volume).

Saving Lives

Many justifications articulated by supporters in both movements underscore the life-saving goal of their actions. The justification is presented in clear and stark terms, a moral imperative: people are dying and someone must do something. Newspaper accounts in 2003 are about individuals and groups providing assistance to illegal immigrants crossing the Arizona desert. The number of immigrants who had died trying to cross the desert galvanized them. “Too many people were dying,” said the Rev. Robin Hoover, pastor of the First Christian Church in Tucson. “Death in the desert has called on many of us—former players and new ones—to coordinate our efforts to again address this situation.” (Ellingwood, 2001) “It’s a pretty, upsetting situation, and frankly, we are in a humanitarian crisis,” said another (Innes, 2002). To save lives, supporters searched border areas for people in distress and also started a program of setting up water stations in the desert. To the charge that their actions were illegal, one leader of the nascent movement stated that “We are doing nothing more than giving humanitarian aid to people in the desert who may be dying or in failing health (ibid.)”

Asked to sum up the SM, one person responded simply: “It’s the work of saving lives,” (Tai, 1993). Reflecting on the movement’s success, another asserted that it “saved a great deal of people who might otherwise have been killed in their own countries.” (Pence, 1996) “These people were in a life-or-death situation. It was a matter of saving lives. If they were caught by Border Patrol and sent back to their country in handcuffs,

they were delivered to the death squads,” explained one person in a 2009 retrospective account (Matas, 2009). A response to the charge by authorities and opponents that the immigrants were simply migrant workers entering the U.S. to find work was that “We were able to counter their argument with evidence of why the refugees were really coming here—because they were trying to save their lives, not make money.” (Pence, 1996)

Challenging and Changing Unjust Laws

Participants in the SM believed that the U.S. government— their own government— was involved in some way in the torture and killing of people in Central America. (Coutin, this issue) They further contended that the government was breaching international law or the domestic *Refugee Act* by refusing entry to or deporting persons from Central America. In 1991, Sister Kathleen Healy, head of the San Francisco Covenant, stated that: “The Justice Department today implicitly acknowledges that it has been in gross violation of the law of the land for 10 years.” (Egelko, 1991) Movement leaders accused the U.S. of war crimes and acting in contravention of the 1949 Geneva Convention (Innes, 2002).

Participants in the latter part of the SM contended in justification of their actions that American immigration laws were unjust. “As an organization, we do not encourage people to break the law. We, do, though, advocate quite strongly that unjust laws be changed. In fact, we don’t think it’s right that honest people should have to die in the desert to try to find a job.” (Seigal, 2001) Some participants argued that the domestic laws are unjust and appeal to a higher law, whether international laws protecting human rights or a superior and superseding moral law. As one person stated in justifying the actions of the NSM: “Our function is to help the weakest. Sometimes that means going against the rules, but God’s laws are superior.” (Trevizo, 2007) Facing a choice between competing laws, many in the NSM saw themselves in a situation where they had to make a decisive choice and take practical steps to counter unjust laws.

Echoes

When we reviewed online documents produced and disseminated by sanctuary groups, we noted parallels to justifications identified in newspaper accounts. For example, a 1984 study paper published by the Lutheran Church in America (ECLA), asserted that justifications for the movement were not to be found in the ancient theological traditions of hospitality or the Old Testament tradition of cities of refuge. Rather, the paper contended, the sanctuary movement is more properly understood in the tradition of civil disobedience (see also Cunningham, this volume). This pronouncement by the ECLA is consonant with the prominent justifications identified above: saving lives and countering unjust laws (ECLA, 1984). In a similar vein, online material posted by NSM supporters, focused on concerns that appeared prominently in the newspaper accounts: unjust laws that cause human suffering. In a blog called “God’s Politics—A Blog by Jim Wallis and Friends” a story appears by Rev. Alexia Salvatierra, the Executive Director of CLUE (Clergy and Laity United for Economic Justice, 2007). Rev. Salvatierra writes that:

“Sanctuary is an act of compassion, an expression of mercy. It is, however, not mercy at the expense of justice. Participants in the New Sanctuary Movement believe that our current immigration system is profoundly unjust—so unjust that we believe that we are facing one of those unique moments throughout history when divine law and human law are in conflict and God’s justice demands that we stand with those who break unjust laws even at the risk of sharing their punishment.” It is noteworthy that not all NSM advocates would agree that these actions are in fact illegal under U.S. law (e.g. Center for Human Rights and Constitutional Law, 2011).
<http://www.newsanctuarymovement.org/legal.htm>.

Canada

We identified 98 unique news stories in the Canadian media press, and coded 253 quotations that contained justifications for sanctuary. These stories were drawn from the period 1987-2011 but were not evenly distributed across that time period. There were several very significant spikes in occurrences around 1987 (n=5), 2004 (n=8), 2006-2007 (n=37) and 2010 (n=10). The 1987 spike reflects Canada’s involvement in the U.S. Sanctuary Movement, the 2004 spike coincides with the Canadian government’s first violation of sanctuary, and the latter two spikes appear to coincide with changes in government refugee and immigration policy (see Lippert 2006).

Caring for Neighbours and Friends

Moral arguments were the most common justification, occurring in one hundred thirty-four quotations. Rarely did we find grand arguments about the role of sanctuary in Canadian society, and when they were made, they were usually articulated by clergy: “we’re also called to be a kind of conscience of the nation and raise questions when we feel things are unjust.” (Mayeda, 2006) The earliest news story on Central American refugees in 1987 contained the justification: “We’re doing it because we believe they have a right to come to Canada...we’re not going to change that just because of a law.” Most moral arguments were rather personal concerns for the safety of the refused refugee and their families: “These people are established. They are our neighbours and friends. Why the hell are they being treated like this?” (Sanders, 2007) The majority of cases were claimants who had been in the community during their lengthy process, developed deep ties, and were now perceived differently. Not all refugees in sanctuary were Christian or in churches, but there was a perception expressed in several stories that the government would be less inclined to violate sanctuary of a Christian church rather than of a mosque or temple. Canadian sanctuary supporters appear willing to ignore past illegal behaviour in offering sanctuary. Those sheltered have included former spies and convicts, who later changed their lives. Undergirding some justifications were particular ideas about Canada and Canadians, “I believe my country of Canada behaves with compassion and decency” (Schultz, 2007), perhaps suggesting that sanctuary supporters rather than the government represented the “true Canada.” Although many speakers expressed strong emotions, few resorted to inflammatory language, though one supporter invoked the memory of French citizens who hid Jews from Nazis (Petricevic, 2006).

Two subsets of cases at both ends of this period were noteworthy. One presented a unique Canadian problem: U.S. deserters during the Iraq war, and the second regarding Central American refugees, and the U.S. Sanctuary Movement. During the Vietnam War Canada welcomed large numbers of war resisters from the United States, and churches, notably the United Church of Canada, supported these new arrivals (Maxwell, 2006, 807). Though not supporting the Iraq war, this time the Canadian government did not automatically extend refugee status to American deserters. In response some churches sheltered resisters from deportation, and justified this action both on moral and historical grounds: “To embrace those resisting war is part of our heritage...the strong Canadian tradition as a haven from militarism.” (Petricevic, 2006) The second unique group was Central American refugee claimants particularly discussed in news stories from 1987-1992. These sanctuary supporters appeared to identify with their American counter-parts, and were more likely to speak in strong moral terms: “I’m sorry, but we have a wicked government.” (Cieroux, 1987)

Bridging the Gap

The second most dominant theme was the “broken system”, expressed in 73 quotations. General complaints described systemic problems, “clearly, he was lost in the shuffle and that’s not his fault, it’s the fault of the system.” (Egan, 2007) These complaints included unreasonably slow processes, lost documentation, and rigid policies; problems endemic to many bureaucracies. Supporters countered that the consequences of a breakdown of this system might be catastrophic: “when genuine refugees fall between the cracks in a system, they can die there.” (Kapica, 1993) Supporters had specific issues with the system, particularly the lack of an appeal process for refused refugees. This was a contentious issue in the later years when supporters alleged promised reforms were not implemented (see also Lippert 2009; Czajka, this volume). Consequently, supporters proposed the gap justification: “Churches engage in this act of civil disobedience largely because of inadequate appeal procedures” (Parker, 2006) and “many people feel they are conscience-bound to fill the gap that the government has created.” (Logan, 2004) This justification was often paired with an expressed reluctance to be involved: “fix the system,” said one supporter, “and sanctuary would not be needed.” (Read, 2007) In several narratives, supporters argued they offered sanctuary only rarely and after careful consideration. The information sources supporters used in their determinations were described as superior to the government’s.

Faith and Tradition

We identified justifications invoking faith or tradition in 64 quotations. Some were framed as expressions of a church mission to take counter-cultural positions or simply to express compassion: “this was a really positive time in our church life: what the church is for, what is the church’s mission.” (Sanders, 2011) There were other descriptions of positive impacts on the supporting church. Supporters justified sanctuary as part of every major faith tradition, premised on the sacredness of life. Explicit Biblical citations were few, focusing on care of the poor and strangers, and, in only three occurrences, the Biblical concept of sanctuary. Sacred figures were also invoked in several accounts, such

as the Holy Family fleeing to Egypt as refugees, the Good Samaritan, and Sir Thomas More as an archetype of God's servant before the King. Perhaps the boldest affirmations were those that juxtapose God and King: "No Christian needs reminding that we owe obligations to both God and Caesar," (Hunter, 2000) and, "there's a higher law, the law of God. We cannot take a decision against someone's life." (Bongers, 1992) The sanctuary tradition could be either "respected" or "violated" by authorities. Thus, the meaning of tradition varied and was invoked as a tradition of humanitarian aid, war-resistance, Biblical sanctuary, refugee support or shelter in the House of God.

Echoes

We identified documents created by the United Church of Canada (UCC), the Canadian Conference of Catholic Bishops (CCCB), the Presbyterian Church in Canada (PCC), and the Evangelical Lutheran Church in Canada (ELCC). Several of these documents were created to give guidance to local congregations considering offering sanctuary. When we considered these documents, we noted that none of these supporters argued these practices were legal, only morally necessary. We found that appeals to historical and Biblical sanctuary practice were present (e.g. "cities of refuge", UCC, 2004, 3) but not emphasized. The more common appeal was to moral religious obligations to "offer hospitality to the stranger...." (PCC, 2006, 2) and to act on conscience when laws violate the moral order (CCCB, 2005, s. 12). Each document noted the absence of an appeal process based on merit, echoing concerns raised by supporters as noted above.

Two Important Themes

In our review we were faced with the question "what is sanctuary for these supporters?" For some it entwined ideas of hospitality and compassion, while for others it was civil disobedience. In all jurisdictions grassroots sanctuary supporters described being motivated by real concern for human suffering. In the UK, Canada, and the SM in the US, supporters appear to sincerely believe the threat to refugees' lives if returned home. The UK supporters also addressed the immediate deprivation of basic necessities for refugees, while the later US movements addressed an immediate danger of death by exposure. Sanctuary supporters appeared to be acting in good faith as Good Samaritans. In all jurisdictions there were general concerns about the fairness of their respective refugee systems, but supporters in the UK and Canada sought to address specific problems by their actions. The withdrawal of state support in the UK for failed refugees, and the alleged heavy-handed removal tactics supporters found impossible to ignore. The lack of an appeal process in the Canadian system provided both the opportunity and perceived necessity for intervention. Where many factors behind refugee migrations are beyond individual state control, supporters identified issues that governments were able to address. The U.S. supporters appeared far more critical about the viability of their nation's immigration system.

Turning briefly to religious arguments, supporters were quick to note that concepts of sanctuary exist in most faith traditions. 'Abd al-Rahim, for instance has argued for an Islamic understanding of sanctuary founded on the dignity of humans ('Abd al-Rahim,

2008). Most religious justifications in these news stories were rooted in a Christian worldview. We have addressed elsewhere the applicability of the Biblical practice of sanctuary like the “Cities of Refuge” to contemporary practices (Michels and Blaikie, 2009). It is sufficient here to note that this Biblical and the modern practice addressed different issues, and were not analogous. Sobrino has offered perhaps the earliest modern theological justification of sanctuary: “The sanctuary movement is justified theologically because it is a way of defending the lives of the poor and thus of believing and acting out biblical faith. The central theological thesis is as follows: God is the defender of the lives of the poor and that defense is absolute and unconditional” (Sobrino, 1988, 169). Acknowledging later theological justifications, we felt Sobrino’s thesis remains wide enough to include all the expressions of sanctuary we identified. We recognized that many supporters wrestled with a theological tension. We heard expressed the two New Testament maxims: “we must obey God rather than human beings” (Acts 5:19) and “give to Caesar what is Caesar’s and to God what is God’s” (Mark 12:17). Against these is the further obligation of respect and obedience to temporal authorities (Romans 13:1). The interpretative history of these texts is considerable (see Pervo, 2009, 144; Evans, 1982, 245; Marcus, 2000, 826), and points to the challenges that Christians have had in being faithful to these obligations, and the difficult choices they have made when they cannot.

CONCLUSION

Given the considerable involvement by churches in sanctuary provision, we had anticipated more complex religious arguments. There was some evidence of these in the documents of religious groups. Supporters argued more often from a moral ground, and invoked the role of conscience, frequently using religious terminology. We are inclined to believe that the religious justifications were in some respects after-thoughts, though supporters were frequently motivated by the strong moral traditions of these communities. Many supporters rather presented their acts in the traditions of civil disobedience, rooted in the social history of western democratic states. This potentially situates these actions within the ethos of our times with the “Arab Spring” and the “Occupy Wall Street” movements. Theologians like Jim Wallis are already making these connections:

Offering that sanctuary to the Occupiers -- at our tables, on our property, in our parish halls and church basements, and in our sanctuaries for the quiet prayer and reflection that every movement needs to sustain itself -- could be the beginning of a powerful relationship between the faith community and the leaders of an emerging generation that is so clearly and passionately committed to creating a better world. (Wallis, 2011)

We are uncertain how to interpret the choice of moral rather than religious arguments. Certainly the failures to address clergy abuse in Canada, the UK and US have undermined public confidence in the churches’ moral leadership. Justifications built on conscience rather than faith may be perceived as more readily accepted. Yet it appears to us that there may be room for a religious argument as well that draws on these strong moral traditions of compassion, justice and care giving. Perhaps it will be the impetus for other civil movements such as Wallis described above that will inspire religious groups to

develop and more clearly articulate a theology of sanctuary and civil action rooted in their own understandings of human dignity.

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