

The Cross at Wren Chapel (A)

Shortly after Gene R. Nichol became President of the College of William & Mary in July 2005, he was called upon to address issues of diversity at the historic Virginia college. Some considered the William & Mary (W&M) team nickname, “The Tribe,” to be offensive; others believed it honored the college’s historical ties to Native Americans and affirmed a sense of community. As Nichol responded to this early challenge, he would also take on another issue that would test the young college president: a dispute over the display of a cross at Wren Chapel.

At the center of what would become a firestorm of controversy was a bronze-plated cross, less than two feet in size. Early on, Nichol questioned the display of a Christian cross in a building also used for secular events at a public university. He recognized that Wren Chapel, like the college itself, was originally established for Christian purposes; however, it now served a religiously diverse community. Nichol wanted the campus to be a place where every student felt welcome. How he would accomplish this goal would prove to be a far more complex – and contentious – question.

William & Mary

On February 8, 1693, King William III and Queen Mary II of England chartered a school in the Colonies. The purpose of the college was:

...that the Church of Virginia may be furnished with a seminary of ministers of the Gospel, and that the youth may be piously educated in good Letters and Manners, and that the Christian faith may be propagated amongst the Western Indians, to the Glory of Almighty God.”¹

By 1700, before the city of Williamsburg was established, the college’s first building was constructed: Sir Christopher Wren Building. In the early years, Wren housed the Indian School: W&M’s own history notes that the school would fail in its goal to “Christianize the native populace” and have the unintentional result of enabling students “to defend their tribes’ cultures and well-being.”² In 1732, a chapel was constructed in the Wren Building.

Thomas Jefferson studied in the Wren Building when enrolled at W&M; he later played a critical role in reorganizing the college. In 1779, just three years after W&M severed ties to Britain, the Divinity School and Indian School were discontinued, and William & Mary officially became a university with the establishment of the Law School. In 1781, classes were cancelled as a result of the British invasion of Virginia but resumed the next year.³ In the years and centuries that followed, the school had many “firsts” and historic accomplishments. By 1906, W&M became a public institution, as a state-supported school. In 1918, W&M became co-educational.

William & Mary now takes great pride in being the second oldest college in America and one of eight schools known as a “Public Ivy.” W&M aims to balance its historical beginnings with its contemporary relevance, as indicated by the use of the slogan “William & Mary: America’s Newest Old School.” Their “Traditions” web page includes the disclaimer “Anything but Traditional”; it then details annual events, including the Yule Log and King and Queen Ball.⁴

The college's oldest structure, the Wren Building, still stands as a symbol of W&M's traditions and history: it is known as "the soul of the college."⁵ Although the building's interior has been destroyed by fire on three occasions, it has the distinction of being the oldest college building in the US. Today, like the rest of the campus, it is wireless; it is home to classrooms, faculty offices, and the historic Wren Chapel.

Gene Nichol and "The Tribe"

Nichol was familiar with W&M when he came on as president, having spent three years at the Law School in the 1980s as James Gould Cutler Professor and the Director of the Institute of Bill of Rights Law. He was a respected legal scholar and Dean of the Law School at the University of North Carolina, yet Nichol was not an "ivory tower" academic. Known as "Big Nick," the former varsity football player was considered affable and articulate. Over the years, he had been active in public affairs and journalism, testified before a number of state legislatures and the Congress, and served as a political columnist, op-ed writer, and contributor to newspapers and periodicals. In the mid-1990s, he hosted a public affairs program for a Denver television station called "Culture Wars." Yet little could have prepared him for the culture wars that would mark his tenure as president.

On campus and beyond, concerns were expressed about W&M's use of the moniker "The Tribe." In August 2005, the National College Athletic Association (NCAA) announced that 18 colleges would be banned from holding post-season events unless they change their use of Native American nicknames and mascots deemed to be "hostile and abusive." One of Nichol's earliest activities as president was to respond to the NCAA's request for a detailed self-evaluation, which solicited opinions from the Native American community, the Board of Visitors, alumni, students, and faculty.

Ultimately, W&M concluded that they would not make changes to the nickname or logo, a decision that was praised by the majority of the college community. The report to the NCAA explained that the current understanding of the term "Tribe" for W&M students and alumni was "inclusive, creating a sense of belonging to the group with strong common purpose with respect for community and engagement with others." Citing the college's "long and venerable history as an institution that has educated and honored Native American peoples" and the supportive view of the Native American community, the report noted that this decision is "fully in keeping with our deep commitment to build an inclusive community characterized by human equality, pluralism, and mutual respect."⁶

W&M later learned that the NCAA would permit the continued use of the nickname "The Tribe"; however, W&M would be required to discontinue the two-feather logo. In an October 10, 2006 letter to the W&M community, Nichol announced with regret that they would agree to phase out the two-feather logo and engage in an "inclusive process" to create a new design. Nichol ended the letter with his traditional closing, referencing the school's nickname and alma mater song: "Go Tribe. Hark upon the gale."⁷

An Email to Tour Guides

Later that month, on October 26, 2006, W&M student tour guides received an email from the Assistant Director of Historic Campus, Melissa Engimann. She wrote to advise that the cross had been removed "[i]n order to make the Wren Chapel less of a faith-specific space, and to make it more welcoming to students, faculty, staff, and visitors of all faiths." She explained that the cross could be returned to the altar by request

and noted that any questions or concerns about this change should be directed to her or the Director of Historic Campus, Louise Kale. Engimann added:

It has always been the Chapel and will continue to be the Chapel even without the cross on the altar. Inform visitors (as you always do) that the College was once affiliated with the Anglican Church, and while it is now a public university, the Wren Chapel continues to be used as a nondenominational chapel. Weddings, memorial services, and student-led prayer services are held here, as well as initiations and their student activities.⁸

The email concluded by inviting students to an organ recital and wishing them a happy homecoming.

In the days that followed, word of the removal of the cross from the altar at Wren Chapel quickly made its way across campus. Students were surprised by the decision, and Nichol was called upon to respond.

An Email of Confirmation

Nichol sent an email to all W&M students on October 27, 2006, confirming the decision to remove the cross from Wren Chapel. He stated plainly: “I have not banished the cross from the Wren Chapel.” Nichol noted that, as the chapel is used by members of various faiths, “[t]he cross will remain in the Chapel and be displayed on the altar at appropriate religious services.” He wrote:

...the Chapel is also used frequently for College events that are secular in nature--and should be open to students and staff of all beliefs. Whether celebrating our happiest moments, marking our greatest achievements, or finding solace during our most profound sadness, our Chapel, like our entire campus, must be welcoming to all. I believe a recognition of the full dignity of each member of our diverse community is vital.

His email concluded, “I welcome a broader College discussion of how the ancient Chapel can reflect our best values.”⁹ This discussion would be held on campus, and well beyond.

A Grassroots Movement

As Vince Haley was reading the *Sunday Richmond Times Dispatch* on October 29, 2006, he noticed an article about his alma mater; he was surprised and shocked to learn of Nichol’s decision regarding the cross, and knew he had to do something. By October 31, 2006, Haley had contacted three W&M students and registered a new website “dedicated to the return to the policies that governed the display of the Wren Cross in Wren Chapel prior to President Nichol’s order to remove it.”¹⁰ The site included extensive information about the dispute, with primary materials and correspondence, as well as an online petition. It brought together a grassroots movement of those opposed to Nichol’s decision, including many alumni, known as the “Save the Wren Cross Coalition.”

On November 17, 2006, Haley wrote a piece for the *National Review*, in which he reflected upon the implications of Nichol’s decision: “... it will signal a dramatic weakening in the intellectual standing of a once proud college and will have corrosive effects for the wider culture.”¹¹ He noted that the issue had received little media attention; however, as Newt Gingrich’s research director at the American Enterprise Institute, Haley was well-positioned to bring new voices into the debate over the cross.

In the months that followed, more than 10,000 people would sign the online petition of SaveTheWrenCross.org, asking for the cross to return to its central place on the altar.

A Statement to the Board of Visitors

The college's governing board, the Board of Visitors (BOV), were among those who began to receive strongly worded letters and emails about the cross display. Nichol prepared a statement about the decision, which he read before the November 16, 2006 meeting of the BOV. Nichol told the Board that the issue was being discussed by the Student Assembly and faculty councils, and that while many approved of the change, he acknowledged that some strongly disagreed: "Some have thought that my steps disrespect the traditions of the College, or, even more unacceptably, the religious beliefs of its members. That perception lies heavy on my heart. I understand that I tread on difficult ground."

Nichol affirmed that, as a Christian himself, the cross is "the most potent symbol" of the faith; accordingly, its place in Wren Chapel "sends an unmistakable message that the Chapel belongs more fully to some of us than to others." Nichol noted that this might give an impression of "insiders and outsiders" at the college: "Those for whom our most revered place is meant to be keenly welcoming, and those for whom presence is only tolerated. That distinction, I believe, to be contrary to the best values of the College." His statement continued:

It is precisely because the Wren Chapel touches the best in us—the brightened lamp, the extended hand, the opened door, the call of character, the charge of faith, the test of courage—that it is essential it belong to everyone. There is no alternate Wren Chapel, no analogous venue, no substitute space. Nor could there be. The Wren is no mere museum or artifact. It touches every student who enrolls at the College. It defines us. And it must define us all. I make no pretense that all will agree with these sentiments. The emotions and values touched by this dispute are deeply felt. But difficult issues are the grist of great universities. Amidst the turmoil, the cross continues to be displayed on a frequent basis. I have been pleased to learn that students of disparate religions have reported using the Chapel for worship and contemplation for the first time. In the College's family there should be no outsiders. All belong.¹²

"A Cross is Offensive?"

On the Nov. 21, 2006, episode of "The 700 Club," TV preacher Pat Robertson spoke of the Wren Cross controversy:

A cross is offensive? Tough luck ... I'm not asking some other religion to take down its symbol.... William and Mary was founded to train ministers to preach the gospel to the Indians. Why do we want to eliminate the Christian heritage? It's the source of our strength. Why are we so afraid of proclaiming the thing that was the origin of this land?¹³

Nichol's position on the cross was further questioned when The Daily Press published the results of a Freedom of Information Act request filed by SaveTheWrenCross.org. W&M officials were asked to provide copies of letters from students or alumni who reported discomfort with the cross in the chapel, but only one was found.¹⁴

Newt Gingrich was among those who questioned the reasons for Nichol's decision. Writing together with Christopher Levenick in the *National Review*, they argued: "The controversy at William and Mary is one of

Nichol's own creation, based on vicarious offense taken in the service of arbitrary principle." The article suggested that Nichol consider the legal argument that "the Constitution intends to diminish the possibility of religious conflict. Those who needlessly disturb the peace are thus at direct odds with its purpose; tearing down long-established religious symbols is therefore as unacceptable as needlessly erecting new ones."¹⁵

"Modest Steps"

As the semester came to a close, on December 20, 2006, Nichol sent an email message to students, staff, and faculty. [See Exhibit 1 for full text.] He stated that while "opinion on campus is far from uniform" on the question of the cross, the Student Senate voted not to oppose the change, and the faculty has supported the decision. He also acknowledged the high volume – and heated nature – of correspondence received about the cross. Nichol described his efforts to discuss "ways to honor our traditions while assuring that the Chapel is equally welcome to all" with students, faculty, staff, ministers, board members, and alumni. Nichol stated that while there are no "magic answers," he wanted to offer some reflections and "modest steps" to amend the policy as he looks to the future.

Nichol's email described Wren Chapel as "the most ennobling and inspiring place" in "our most important and defining building." With a reminder that W&M is a public institution, he noted that for some members of the community, the display of the cross may send a message of exclusion. He described examples of those who have felt unwelcome or have questioned the appropriateness of the display of a cross during events such as a Phi Beta Kappa initiation or an a capella practice. Nichol clarified that "They did not say, of course, that the cross is an offensive or antagonistic symbol. They often understand that to Christians, like me, the cross conveys an inspiring message of sacrifice, redemption, and love."

Nichol continued:

My goal has not been to bleach all trace of religious thought and influence from our facilities and programs, but rather to offer the inspiration of the Wren to all. As an array of our campus ministers have indicated—in expressing strong support for the altered policy—it is the very vitality and the increasing diversity of our religious community that calls for a more encompassing and accessible use of the Wren.

In the email, Nichol acknowledged his mistakes: "I likely acted too quickly and should have consulted more broadly. Patience is a vital virtue—especially for a university president. I'm still learning it. The decision was also announced to the university community in an inelegant way." He followed up with a series of questions, including: "Do we take seriously our claims for religious diversity, or do we, even as a public university, align ourselves with one particular religious tradition?"

Moving forward, Nichol suggested the following "modest steps": the altar cross would continue to be available for display as requested for Christian religious services or prayer and would also be in place on the altar all day on Sunday. In addition, a plaque would be commissioned – and permanently displayed – about Wren Chapel's Anglican origins and William & Mary's beginnings as a Christian institution. These steps could be taken, the email stated, "without substantially affecting [Wren Chapel's] openness and accessibility for college use." He reported that Hillel had reserved the Wren Chapel for the first time, and that Muslim and Jewish students were utilizing the space more regularly.

In closing, Nichol affirmed the “common ground” shared by both sides of the dispute, including the educational cause of W&M and the message of its diversity statement, “where people of all backgrounds feel at home.” He concluded his letter, as always: “Go Tribe. Hark Upon the Gale.”¹⁶

Pressure from the College Community and Beyond

On December 22, 2006, Margee Mulhall, an alumna from California wrote to the college stating her disapproval of Nichol’s decision. “At first I thought this had to be a joke. Even in the ultimate ‘PC’ state, we allow crosses in our chapels.” Mulhall explained that she would not donate to W&M until the decision is reversed, writing: “No Cross, No Cash.”¹⁷ This slogan would be repeated by others who wanted a return to the prior policy, and a “No Cross, No Cash” Blog would later list W&M alumni who opted to withhold donations.

Media outlets and online discussion boards closely followed the controversy. In the conservative blogosphere, Nichol, and his actions, were often described as “politically correct” and “anti-Christian.” American Spectator named Nichol “Enemy of the Year 2006,” and described Nichol as “a national disgrace” who might become “the next cultural minister of the Taliban.”¹⁸

A Committee Formed

In Nichol’s “State of the College” address of January 25, 2007, he described the many accomplishments of the W&M community related to diversity and financial aid and announced the creation of a special committee. “I will ask its members to examine the role of religion in public universities in general, and at the College of William and Mary in particular—including the use of the historic Wren Chapel.” The committee would be co-chaired by faculty members Dr. James Livingston from Religious Studies and Dr. Alan Meese, a legal scholar. The larger committee would include other faculty, as well as alumni, students, and staff.¹⁹ It seemed that, finally, the college was moving towards a resolution.

Sex Workers Art Show

Any sense of optimism would soon be extinguished, as Nichol found himself in the midst of yet another controversy. On February 4, 2007, the Sex Workers’ Art Show, an explicit performance by porn stars, strippers, and other sex workers, was scheduled to be performed on campus. The show was funded by the Student Assembly and endorsed by more than ten student organizations. Some requested that Nichol cancel the performance, but he refused:

My views and the views of others in the community about the worth or offensiveness of the program can provide no basis for censoring it. The First Amendment and the defining traditions of openness that sustain universities are hallmarks of academic inquiry and freedom. It is the speech we disdain that often puts these principles to the test. The College of William & Mary will not knowingly and intentionally violate the constitutional rights of its students. Censorship has no place at a great university.²⁰

The show went on as planned with a full capacity crowd; hundreds were turned away. Yet some observers asked: how is it that sex workers are welcome at W&M, and not the cross?²¹

A Speaker at the Board of Visitors: Vince Haley

On February 8, 2007, the BOV invited comment from those concerned about the Wren Cross. Among those who spoke was Vince Haley (W&M '88), co-founder of SaveTheWrenCross.org. He spoke glowingly of his visit to campus for the 2006 homecoming, and praised the gifted teachers at W&M. Then, he recalled reading the news of Nichol's decision regarding the cross and feeling a sense of "disbelief." Haley found Nichol's claim that a cross was inconsistent with the dignity and diversity of the community to be "incomprehensible – and frightening." Moreover, upon reading Nichol's email inviting a campus discussion about the Chapel, Haley noted: "[W]ouldn't you normally have such a discussion BEFORE making such a decision?"

Haley affirmed the need to respect religious difference, and asked, "[W]hy must this lead to decisions of subtraction rather than addition?" He continued:

From my reading of the statements explaining this decision, I identify a theory that says religious symbols are obstacles to the full flourishing of a College community, even when they are historically appropriate. This judgment is at odds with both the approach of other Colonial Colleges chapels and the U.S. service academies in dealing with even more diverse student bodies than W&M, as well as with American traditions of religious pluralism. If the previous cross display practice was not sufficiently welcoming, then how might we add, including the building of additional religious space on campus?²²

Haley suggested that the cross be returned to its place on the altar immediately, rather than waiting for the results of the committee. He asked that the BOV, rather than Nichol, vote on any proposed changes to the policy of the display of the cross.

A Speaker at the Board of Visitors: Rev. Herman Hollerith

Rector Michael Powell, the head of the BOV, asked Rev. Herman Hollerith to speak at the February 8, 2007 board meeting. As a minister at nearby Bruton Parish Episcopal Church, he was hesitant to comment to the BOV; Hollerith quoted the phrase "I have no dog in this fight." He provided a historical perspective, explaining that for 300 years in Anglican and Episcopal churches, no crosses were displayed. He noted that the first altar cross was displayed on the Bruton Parish Church altar in 1909, and that this cross was brought to the Wren Chapel in 1938 or 1939 during church renovations. Hollerith explained that the cross likely came to Wren Chapel "by accident" and was never formally given to W&M.

Hollerith joked: "We have a saying in the Episcopal Church ... it takes five minutes to create a tradition, and 500 years to get rid of one." Taking a more somber tone, he said that the cross controversy blurs two issues:

The first issue is the presence or absence of a cross in Wren Chapel or in any other chapel or church is what has been called in classical theology 'adiaphora,' which is a Greek word meaning simply 'matters indifferent to the Christian faith.' It is theologically trivial in the scheme of things, as are all matters of decorative objects used in worship (my collar, candles on the altar, etc.). That is not to say that such things lack some importance – just that such things are of minor importance.

The second issue is the presence or absence of God in the public realm. This is the more important issue and the one that taps into people's fears and concerns – the fear that God is being removed somehow from modern American life.

Hollerith asked that these two issues not be confused and cautioned against addressing them the same way. He added, “William & Mary has a golden opportunity to address the second issue, the profound one! And, I believe, you are in the process of doing so!”

His statement went on to ask a series of pointed questions about the controversy, including whether the return of the cross would serve to trivialize its meaning, and asked: “Is this about winning a victory for God, or is this about winning a victory over the college president? This is a question that you must wrestle with as leaders of this institution.” Hollerith stated, “As a man who has dedicated his life to the cross, I urge you as leaders to be cautious of the tremendous religious and political hypocrisy that surrounds this issue.”²³

Loss of a Pledge

After the meeting of the BOV, the pressure on Nichol increased when a local newspaper, *The Daily Press*, reported on another outcome of the cross controversy: a wealthy donor to the college, who described Nichol’s decision regarding the cross as “unbelievable,” was withdrawing a \$12 million pledge.²⁴

Looking Forward

Beginning on February 23, 2007, the W&M Committee on Religion in a Public University held a series of meetings. They were open to the public; however, public comment was not entertained. The Committee was asked to make a recommendation to the President and the Board of Visitors by the end of the spring semester.

Amidst continuing pressure, Nichol was hopeful for the success of the Committee. He was buoyed by the support he was receiving but shocked by the tenor of the statements made against him. While listening to the new Bruce Springsteen album, Nichol found some reassurance in one song’s lyrics: “...you’ll take comfort in knowing you’ve been roundly blessed and cursed.”²⁵

Endnotes

¹ Cary Michael Carney, *Native American Higher Education in the United States*, (Piscataway, NJ: Transaction, 2007), p. 1.

² “The Indian School at William and Mary,” William & Mary Web site, <http://www.wm.edu/about/history/historiccampus/indianschool/index.php>, accessed January 2009.

³ “William & Mary 1750-1799,” William & Mary Web site, <http://www.wm.edu/about/history/chronology/1750to1799/index.php>, accessed January 2009.

⁴ “William & Mary Traditions,” William & Mary Web site, <http://www.wm.edu/about/history/traditions/index.php>, accessed January 2009.

⁵ “The Wren Building,” William & Mary Web site, <http://www.wm.edu/about/history/historiccampus/wrenbuilding/index.php>, accessed January 2009.

⁶ “NCAA Institutional Self Evaluation Examining the Use of American Indian Mascots, Nicknames, and Logos, College of William and Mary,” William & Mary Web site, <http://web.wm.edu/NCAA/report.php>, accessed January 2009.

⁷ Marc Fisher, “Hostile Web site, and Abusive Feathers,” October 12, 2006, post on blog, “Raw Fisher,” *The Washington Post* Web site, http://voices.washingtonpost.com/rawfisher/2006/10/hostile_and_abusive_feathers.html, accessed January 2009.

⁸ “Assistant Historical Director’s Email Announcing the Decision,” Save the Wren Cross Web site, <http://www.savethewrencross.org/melissasemail.php>, accessed December 2008.

⁹ “Gene Nichol’s email confirming order to remove Cross from Wren Chapel,” Save the Wren Cross Web site, <http://www.savethewrencross.org/nicholsemail.php>, accessed December 2008.

¹⁰ “About Save the Wren Cross Coalition,” Save the Wren Cross Web site, <http://www.savethewrencross.org/about.php>, accessed December 2008.

¹¹ Vince Haley, “Save the Wren Chapel,” *National Review*, November 17, 2006, <http://article.nationalreview.com/?q=NTk3Njc2MWM5OWNjZmY3MmNjYzUzMGJiNjZlZWFiY2E=>, accessed January 2009.

¹² All quotes in “A Statement to the Board of Visitors” section: “Text of Nichol’s Address to the Board of Visitors,” Save the Wren Cross Web site, <http://www.savethewrencross.org/bovtext.php>, accessed December 2008.

¹³ Lauren Smith, “At Cross Purposes: Chapel Change at William and Mary Ignites Nasty Debate,” February 7, 2007, post on blog, “Wall of Separation,” Americans United for Separation of Church and State Web site, <http://blog.au.org/2007/02/07/at-cross-purposes-chapel-change-at-william-and-mary-ignites-nasty-debate/>, accessed January 2009.

¹⁴ “Chapel cross issue stands 5,000 to 1, but who’s counting?” *World Net Daily*, November 29, 2006, http://www.wnd.com/news/article.asp?ARTICLE_ID=53149, accessed January 2009.

¹⁵ Newt Gingrich and Christopher Levenick, “Laus Deo: Crossing the Line at William and Mary,” *National Review*, January 31, 2007, <http://article.nationalreview.com/?q=OWNkZWJlYThlZGMzMzRhZTQwNDYwMGQlZGQyODJmNDg>.

¹⁶ All quotes in “Modest Steps” section, “December 20 Email from President Gene Nichol,” Save the Wren Cross Web site, http://www.savethewrencross.org/nichol_email_dec20.php, accessed December 2008.

¹⁷ “Alumni Withholding Contributions Until Wren Chapel Cross is Restored,” December 24, 2006, post on blog, “No Cross, No Cash!” <http://nocrossnocash.blogspot.com/search?updated-min=2006-01-01T00%3A00%3A00-05%3A00&updated-max=2007-01-01T00%3A00%3A00-05%3A00&max-results=1>, accessed January 2009.

¹⁸ “Enemy of the Year,” *The American Spectator*, December 29, 2006, <http://spectator.org/archives/2006/12/29/enemy-of-the-year>, accessed January 2009.

¹⁹ “William and Mary Committee on Religion at a Public University,” William & Mary Web site, http://web.wm.edu/committee_on_religion/?svr=www, accessed January 2009.

²⁰ “Statement on the Sex Workers Art Show from Nichol,” University Relations, William & Mary Web site, <http://web.wm.edu/news/archive/index.php?id=8631>, accessed January 2009.

²¹ “College of William and Mary Hosts Sex Worker Show on Campus,” *Fox News*, February 23, 2007, <http://www.foxnews.com/story/0,2933,254142,00.html>, accessed January 2009.

²² All quotes in “A Speaker at the Board of Visitors: Vince Haley” section: “Statement by Vince Haley, W&M Class of 1988, Co-Founder, SaveTheWrenCross.org,” Save the Wren Cross Web site, http://www.savethewrencross.org/bov_haley.php, accessed December 2008.

²³ All quotes in “A Speaker at the Board of Visitors: Rev. Herman Hollerith” section: “William and Mary Committee on Religion at a Public University: Herman Hollerith, February 8, 2007” William & Mary Web site, http://web.wm.edu/committee_on_religion/statements/hollerithfeb8.php?svr=www, accessed January 2009.

²⁴ “Cross Ban Could Cost \$12 Million” *World Net Daily*, February 28, 2007, http://www.wnd.com/news/article.asp?ARTICLE_ID=54493, accessed January 2009.

²⁵ Gene Nichol, “Keynote Address by Gene Nichol,” *The North Carolina State Bar Journal*, (Spring 2008) http://www.ncbar.com/journal/archive/journal_13,1.pdf p.11, accessed January 2009.