

LIBERATION THEOLOGY AND POLITICAL PROCESS: A CASE STUDY OF NEW YORK CITY'S MAYOR

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I. INTRODUCTION

Liberation theology as a religious movement focuses on the socio-economic and political liberation of the oppressed through the disruption of governing structures.¹ On a conceptual level, this movement has been extensively considered and examined by legal scholars and theologians. On an empirical level, discussions regarding its actual impact on real world issues have largely been limited to Latin America, where the movement began.² This essay explores the application of liberation theology in United States politics through a case study of New York City Mayor Bill de Blasio.

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1. See GUSTAVO GUTIÉRREZ, A THEOLOGY OF LIBERATION xiii (Caridad Inda & John Eagleson trans., 1973) (“[Liberation theology is] a theological reflection born of the experience of shared efforts to abolish the current unjust situation and to build a different society, freer and more human, . . . to give reason for our hope from within a commitment that seeks to become more radical, total, and efficacious. It is to reconsider the great themes of the Christian life within this radically changed perspective and with regard to the new questions posed by this commitment. This is the goal of the so-called theology of liberation.”).

2. As one commentator has explained,

[I]mpacts are the result of complex social processes, and cannot be understood in deductive terms, as if theological precepts were indirect guides to action, read and then acted upon in some simple and direct fashion. Careful attention is needed to when and how liberation theology emerged, and to the implications of the historical moment in which it appears. Analysis must also move beyond liberation theology *as a system of ideas*, to ask how much ideas are received and acted upon by concrete individuals, groups, societies, and political systems.

Daniel H. Levine, *Assessing the Impacts of Liberation Theology in Latin America*, 50 REV. POL. 241, 242 (1988). This critique was true of liberation theology in Latin America in the 1980s. At the time, leftist guerrilla movements arose in Peru, Bolivia, Colombia, El Salvador, Guatemala and elsewhere, all of which provided fertile ground for the application of liberation theology. Levine's critique, however, continues to apply to the use of liberation theology in the United States, which has not experienced these types of governmental changes. On the Latin American shift to democracy, see Arch Puddington, *Latin America Shows That Democratization Is Possible Anywhere*, FREEDOM HOUSE (Aug. 13, 2015), <https://freedomhouse.org/blog/latin-america-shows-democratization-possible-anywhere>.

As one of the few politicians who has voiced support for liberation theology,³ Mayor de Blasio has openly discussed the movement's influence on his work in the public sector. Thus, while Mayor de Blasio—a non-Christian white male—may not appear to be representative of the liberation movement as a whole, his actions as both Mayor and Public Advocate speak toward the impact this theological framework has exercised on his political ideology. Moreover, this impact can be considered and assessed through his work on, among other things, religious freedom.⁴ Notably, the influence that liberation theology has had on Mayor de Blasio in this area addresses a main critique of the movement, i.e., the potential for the hyper-politicization of theology at the expense of a pronounced diversion from the traditional, more spiritual, role of the Christian church.⁵ Despite this criticism, this Article suggests that through politicization of liberation theology, Mayor de Blasio has enabled people to draw nearer to God, not further away.

Part II of this Article outlines Liberation Theology as a Latin American movement grounded in the experiences of injustice and social inequality. Part III explores Mayor de Blasio's religious background and liberation theology's influence on his political ideology. Part IV analyzes the impact of the liberation movement on Mayor de Blasio's political career. Here, particular attention is given to his role in the *Bronx Household of Faith* saga, a cluster of First Amendment Rights cases concerning the use of public schools for religious worship. The essay concludes with some brief observations regarding the progress of liberation theology in America and its future impact on the political landscape.

II. LIBERATION THEOLOGY

Liberation Theology developed as a moral reaction to the poverty and social injustice that plagued Latin American countries in the

3. The most famous American politician to distance themselves from liberation theology is President Barack Obama, whose former Chicago pastor received significant attention for his sermons discussing black liberation theology. See Jodi Kantor, *Obama Denounces Statement of His Pastor as Inflammatory*, N.Y. TIMES (Mar. 15, 2008), <https://www.nytimes.com/2008/03/15/us/politics/15wright.html>; see also Ed Sherwood, *Obama and Black Liberation Theology*, WASH. TIMES (May 2, 2009), <https://www.washingtontimes.com/news/2008/may/2/obama-and-black-liberation-theology/>.

4. On worshipping in public forums, see William A. Glaser, Comment, *Worshipping Separation: Worship in Limited Public Forums and the Establishment Clause*, 38 PEPP. L. REV. 1053, 1074–76 (2011).

5. See Manzar Foroohar, *Liberation Theology: The Response of Latin American Catholics to Socioeconomic Problems*, 13 LATIN AM. PERSP. 37, 41 (1986). Liberation theology can be understood as an approach to political theology. See ELIZABETH PHILLIPS, *POLITICAL THEOLOGY: A GUIDE FOR THE PERPLEXED* 46–47 (2012).

1960s and 1970s.⁶ At the time, the Catholic Church was far removed from the social setting of the ordinary believer and was, for that reason, viewed more as a legitimizer of the social order than an advocate for change and reform.⁷ Theologians and missionaries, in contrast, often lived among the poor in these regions and thus experienced an authentic form of systemic oppression for which their mostly western theological training had not provided an adequate response.⁸

Consequently, these theologians, along with other church leaders, “questioned the type of presence adopted by the church and the way indigenous peoples, blacks, mestizos, and the poor rural and urban masses were treated.”⁹ Their conversations on these issues propelled a form of radical social ministry that emphasized work among and for the poor.¹⁰ Bishops and priests called for progress and national modernization, while church groups started radio programs and organized community bases to promote the advancement of those in oppressed communities.¹¹ These grassroots movements included the Young Christian Students, Young Christian Workers, Young Christian Agriculturalists, and the Movement for Basic Education.¹²

The liberation movement gained further traction with the advent of the Second Vatican Council (1962–1965). This gathering of Catholic leaders generated a theological atmosphere of freedom and creativity, which enabled Latin American theologians to “think for themselves about pastoral problems affecting their countries.”¹³ In particular, Vatican II opened the church to a more progressive outlook

6. See PHILLIP BERRYMAN, *LIBERATION THEOLOGY* 4 (1987); see also LEONARDO BOFF & CLODOVIS BOFF, *INTRODUCING LIBERATION THEOLOGY* 1–2 (Paul Burns trans., Orbis Books 1987).

7. BOFF, *supra* note 6, at 66–67.

8. Eric C. Miller, *The Radical Rise of Liberation Theology: An Interview with Lilian Calles Barger*, RELIGION & POL. (Sept. 25, 2018), <https://religionandpolitics.org/2018/09/25/the-radical-rise-of-liberation-theology-an-interview-with-lilian-calles-barger/>; see also Phillip E. Berrman, *Latin American Liberation Theology*, 34 THEOLOGICAL STUD. 357, 357–58 (1973).

9. MARIA CLARA LUCCHETTI BINGEMER, *LATIN AMERICAN THEOLOGY: ROOTS AND BRANCHES* loc. *Introduction* (2016) (ebook).

10. See, e.g., Ann T. Engram & Elena B. Odio, *God as Comrade: The Impact of Liberation Theology in Central America*, 7 J. THIRD WORLD STUD. 192, 192–93 (1990); W. E. Hewitt, *Strategies for Social Change Employed by Comunidades Eclesiais de Base (CEBs) in the Archdiocese of São Paulo*, 25 J. SCI. STUDY RELIGION 16, 16 (1986).

11. See BOFF, *supra* note 6, at 66–67; see also Carol Ann Drogus, *The Rise and Decline of Liberation Theology: Churches, Faith, and Political Change in Latin America*, 27 COMP. POL. 465, 468–69 (1995); see generally LEONARDO BOFF, *ECCLESIOGENESIS: THE BASE COMMUNITIES REINVENT THE CHURCH* (Robert R. Barr trans., 1986) (defining basic church communities and exploring their impact on serving oppressed persons).

12. BOFF, *supra* note 6, at 66–67; see also PAUL E. SIGMUND, *LIBERATION THEOLOGY AT THE CROSSROADS* 151–52 (1990).

13. BOFF, *supra* note 6, at 67.

by signaling its endorsement of democratic government and religious pluralism.¹⁴ Accordingly, larger more visible organizations began to take shape in the ongoing effort toward a more progressive social structure.¹⁵

Of course, these measures were not met without significant opposition, as the case of Oscar Romero, Archbishop of San Salvador (1977–1980), amply demonstrates. During his ministry, Father Romero became an outspoken critic of the assassinations and tortures that had taken place amid growing tensions between the left-wing militias and right-wing oligarchy that controlled his native El Salvador.¹⁶ Though he never expressed a stance on liberation theology,¹⁷ his views on social ministry aligned with the sentiments behind that movement.¹⁸ Notably, his eventual assassination at the hands of a right-wing “death squad” took place while he was giving mass, and the event became a focal point of the Salvadorian Civil

14. The Second Vatican Council’s emphasis on social justice was memorialized in the publication of its final two documents, “The Church in the Modern World,” *Gaudium et Spes*, and “The Declaration of Religious Freedom,” *Dignitatis Humanae*, which many early liberation theologians cited as support for their cause. See, e.g., GUTIÉRREZ, *supra* note 1, at 22 (Citing *Gaudium et Spes* and arguing against the rise of capitalism, Gutiérrez asserts that the idea that economic and social emancipation amount to the full liberation of humanity is “among the forms of modern atheism.”); Louie Verrecchio, *Liberation Theology: Two Prefects, Two Views*, CATH. EXCHANGE (July 19, 2012), <https://catholicexchange.com/liberation-theology-two-prefects-two-views> (observing that “liberation theologians often look to the Pastoral Constitution on the Church in the Modern World of Vatican II (*Gaudium et Spes*) for justification”).

15. BOFF, *supra* note 6, at 67–68; see also Foroohar, *supra* note 5, at 45, 53; Levine, *supra* note 2, at 249.

16. See Jon Lee Anderson, *Archbishop Óscar Romero Becomes a Saint, But His Death Still Haunts El Salvador*, NEW YORKER (Oct. 22, 2018), <https://www.newyorker.com/news/daily-comment/archbishop-oscar-romero-becomes-a-saint-but-his-death-still-haunts-el-salvador>.

17. See Filip Mazurczak, *Archbishop Romero and Liberation Theology*, NAT’L CATH. REG. (May 7, 2015), <https://www.ncregister.com/daily-news/archbishop-romero-and-liberation-theology>; Alvaro de Juana, *Archbishop Romero Had No Interest in Liberation Theology, Says Secretary*, CATH. NEWS AGENCY (Feb. 21, 2015), <https://www.catholicnewsagency.com/news/archbishop-romero-had-no-interest-in-liberation-theology-says-secretary-79788>.

18. Mazurczak, *supra* note 17 (explaining that “[t]he life and teaching of Archbishop Romero are perfectly in sync with Cardinal Ratzinger’s view of liberation theology,” which “praised liberation theology’s fight against socioeconomic injustice” but “condemned certain currents of liberation theology for borrowing Marxist methods of analysis”).

War.¹⁹ In that regard, some have observed that Oscar Romero “has become an unofficial patron saint of liberation theology.”²⁰

Beyond that, the Catholic Church expressed swift opposition to the Marxist views of some liberation theologians. In 1985, Reverend Miguel D’Escoto, who supported the “popular church” of liberation theology, and three other priests were suspended for defying a church ban on clergy holding government jobs, a move largely viewed as a crackdown on the liberationist movement.²¹ That same year, Leonardo Boff, a Brazilian liberation theologian was ordered to observe a year of theological silence by then-Cardinal and future Pope Benedict Joseph Ratzinger.²² In 1992, Boff received another silencing demand, but decided to simply leave the Franciscan order so he could continue his work.²³

Others involved in the struggle for equality against the dominate oligarch and military regimes include Gustavo Gutiérrez, now widely recognized as the father of liberation theology.²⁴ A Dominican priest and Latin American scholar from Peru, Gutiérrez “did not represent a part of Lima’s aristocracy, but rather rose from the oppressed class.”²⁵ As Daniel G. Groody observes, Gutiérrez’s understanding of

19. For a factual account of the connection between liberation theology in El Salvador and Archbishop Oscar Romero’s assassination, see *Doe v. Rafael Saravia*, 348 F. Supp. 2d 1112, 1119–28 (E.D. Cal. 2004). See also Karen Musalo, *El Salvador—A Peace Worse Than War: Violence, Gender and a Failed Legal Response*, 30 YALE J.L. & FEMINISM 3, 9–14 (2018).

20. Mazurczak, *supra* note 17; see also Anderson, *supra* note 16.

21. Josephine McKenna, *Pope Francis Lifts 29-Year Suspension: Reinstates Rev. Miguel D’Escoto Brockman*, AM. MAG. (Aug. 5, 2014), <https://www.americamagazine.org/issue/pope-francis-lifts-29-year-suspension>.

22. *Theologian in Brazil Says He Is Silenced by Order of Vatican*, N.Y. TIMES (May 9, 1985), <https://www.nytimes.com/1985/05/09/world/theologian-in-brazil-says-he-is-silenced-by-order-of-vatican.html>. As many have observed, “Cardinal Joseph Ratzinger, as head of the Vatican’s Congregation for the Doctrine of the Faith 1981–2005 before becoming Pope Benedict XVI, issued official critiques of liberation theology in 1984 and 1986,” expressing “particular concern that some theologians had inappropriately mixed Marxist critique of the global economic system with Catholic theology.” Joshua J. McElwee, *Pope Meets with Liberation Theology Pioneer*, NAT’L CATH. REP. (Sept. 25, 2013), <https://www.ncronline.org/news/theology/pope-meets-liberation-theology-pioneer>.

23. B.C., *What Happened to Liberation Theology?*, ECONOMIST (Nov. 5, 2018), <https://www.google.com/amp/s/amp.economist.com/the-economist-explains/2018/11/05/what-happened-to-liberation-theology>.

24. GUSTAVO GUTIÉRREZ SELECTED WITH INTRODUCTION BY DANIEL G. GROODY, GUSTAVO GUTIÉRREZ: SPIRITUAL WRITINGS 21 (2011) [hereinafter GROODY].

25. Olivia Singer, *Liberation Theology in Latin America*, in MODERN LATIN AMERICA (4th ed. Web Supp 2013), <https://library.brown.edu/create/modernlatinamerica/chapters/chapter->

liberation theology was based on his own subjective experiences among the poor in Peru.²⁶ Gutierrez used his experience to formulate three fundamental claims that eventually defined the movement:

Material poverty is never good but an evil to be opposed. It is not simply an occasion for charity but a degrading force that denigrates human dignity and ought to be opposed and rejected.

Poverty is not a result of fate or laziness but is due to structural injustices that privilege some while marginalizing others. Poverty is not inevitable; collectively the poor can organize and facilitate social change.

Poverty is a complex reality and is not limited to its economic dimension; poverty means early and unjust death, and to be poor, above all, means to be insignificant.²⁷

As time progressed, liberation theology made its way to North America, and developed alongside parallel movements such as black liberation, feminism and, most recently, ecological theology.²⁸ Theologians and legal scholars continued their efforts to connect liberationist theological thought to political action from conceptual and theoretical perspectives.²⁹ Political philosopher Cornel West for instance, in discussing Juan Luis Segundo's work *Faith and Ideologies*, recognized that liberation theologies have served as the "principal forms of Christian prophetic thought and action in our contemporary age."³⁰ Reverend and Law Professor Robert J. Araujo has likewise considered the commonalities between Gutierrez's

[15-culture-and-society/essays-on-culture-and-society/liberation-theology-in-latin-america/](#)

26. GROODY, *supra* note 24, at 32.

27. *Id.*; see also Ronald H. Nash, *The Christian Choice Between Capitalism and Socialism*, in LIBERATION THEOLOGY 45, 49 (Ronald H. Nash ed., 1984) (formulating Gutierrez's three claims of liberation theology as follow: (1) Christians ought to become politically active on behalf of people who are poor and oppressed; (2) the major cause of poverty, injustice, and oppression in the contemporary world is capitalism; and (3) Christians should attack capitalism and work to see it replaced by socialism).

28. Miller, *supra* note 8; Luis Rivera-Pagán, *God the Liberator: Theology, History, and Politics*, LUPA PROTESTANTE (Jan. 30, 2014), <http://www.lupaprotestante.com/blog/god-liberator-theology-history-politics/>. For the initial texts in these areas see JAMES H. CONE, *A BLACK LIBERATION OF THEOLOGY* (1970) (discussing Christianity from the perspective of oppressed black communities in North America); LETTY M. RUSSELL, *HUMAN LIBERATION IN A FEMINIST PERSPECTIVE—A THEOLOGY* (1974) (discussing Christianity and the feminist movement).

29. Studies regarding the impact of liberation theology have been mostly limited to Latin America. See, e.g., Drogus, *supra* note 11, at 467–70.

30. CORNEL WEST, *PROPHETIC FRAGMENTS* 197 (1988).

theology and former Harvard Law Professor Roberto Unger's work, *Knowledge and Politics*.³¹

Over half a century after it began, Latin American liberation theology has developed into an increasingly pluralistic “proliferation” of theologies “by means of the fragmentation of subversive identities.”³² This progression has occurred in several steps. To begin, liberation theology first became conversant with other emerging theologies such as those mentioned above.³³ Second, there was internal diversification that expanded the scope of the liberationist's agenda.³⁴ Notably, this pluralistic proliferation in theological thought has widened the conversation from the Catholic theologians' “preferential option for the poor” to a more diverse—but still distinctly religious—concern for the “excluded,” and “marginalized.”³⁵ Third, new signs point to a shift towards an expression of liberation theology engaged by secular institutions sympathetic to religious causes.³⁶

A modest example of this paradigm shift was the 2013 election of Pope Francis. His ascension to the Papacy drew a profound and renewed interest in liberation theology as the Catholic Church made strides in reconciling itself with theologians that it had historically criticized.³⁷ During his first year in the Papacy, Pope Francis met and celebrated mass with Gustavo Gutiérrez, who had never been formally sanctioned by the Church.³⁸ More recently, the Pope

31. Robert J. Araujo, *Political Theory and Liberation Theology: The Intersection of Unger and Gutiérrez*, 11 J.L. & RELIGION 63 (1994).

32. Rivera-Pagán, *supra* note 28.

33. See CRAIG L. NESSAN, *THE VITALITY OF LIBERATION THEOLOGY* 36–41 (2012); see also WEST *supra* note 30, at 197.

34. Rivera-Pagán, *supra* note 28.

35. *Id.*

36. To be sure, many academics have commented on the gradual decline of liberation theology during the 1990's. This was based both on the rapid democratization of several Latin American countries—which no longer saw an imminent need for the type of reform liberation theology had advocated—and the rise of Evangelical and Pentecostal churches in those regions—which drew believers away from the largely Catholic movement. See generally Drogus, *supra* note 11, at 466, 468, 471.

37. B.C., *supra* note 23.

38. Junno Arocho Esteves, *Pope Francis Praises Founder of Liberation Theology*, CATH. HERALD (June 11, 2018, 9:21 AM), <https://catholicherald.co.uk/pope-francis-praises-founder-of-liberation-theology/>; McElwee, *supra* note 22 (“Some observers of the Catholic theological scene are saying that a personal meeting between Pope Francis and Dominican Fr. Gustavo Gutiérrez could mark a thaw in decades of frosty relations between the church's hierarchy and liberation theologians.”); Cindy Wooden, *Pope Reflects on Changed Attitudes Toward Liberation Theology*, CRUX (Feb. 14, 2019), <https://cruxnow.com/vatican/2019/02/pope-reflects-on-changed-attitudes-toward-liberation-theology/> (“If anybody had said back then that the prefect of the CDF would have brought Gutierrez to concelebrate with the pope, they would have taken him for a drunk,’ the pope told the Jesuits.”).

canonized Oscar Romero who, for many, epitomized the essence of social involvement by religious leaders.³⁹ Now well into his tenure, Pope Francis has repeatedly emphasized the Catholic Church's responsibility to advance the cause of social justice throughout the world.⁴⁰ Thus, in many ways, Pope Francis—as head of the Catholic Church and sovereign of the Vatican City—represents a paradigm shift in the application of liberation theology as a movement no longer effectuated solely by the religious and poor, but also by political leaders within the very power structures that the movement has sought to reform.

III. THE MAYOR AND RELIGION

The political action that liberation theology originally envisioned was primarily one engaged in by the church itself. Churches established community bases and ministers called for social reform from the pulpit. In this sense, the movement was not really a form of political action at all, but a social movement aimed at disputing the governing structures from without—not within. Yet, the continual progression of liberation theology, as Pope Francis has now partially demonstrated, has forged a new path to enable political leaders with liberationist sympathies to effect change from within the controlling structures that perpetuate oppression. Put differently, this paradigm shift has allowed for the political expression of liberation theology by those who, like Mayor Bill de Blasio, are better equipped to effect the very change the early theologians sought to produce.

To be sure, Mayor de Blasio's personal account of his religious affiliation as a child point to an unquestionably secular upbringing. Interviews with reporters reveal that his grandparents emigrated from Italy, the birthplace of Roman Catholicism, in the 1950's, and that he had a great-uncle who was an ordained priest.⁴¹ As for his

39. See Tara Isabella Burton, *Oscar Romero, a Martyr for Social Justice and the Newest Catholic Saint, Explained*, VOX (Oct. 15, 2018, 1:40 PM), <https://www.vox.com/2018/10/15/17977944/oscar-romero-new-catholic-saint>; Pope Francis Canonizes Archbishop Oscar Romero and Pope Paul VI, JESUITS (Oct. 14, 2018), <https://jesuits.org/story?tn=project-20181011052823>.

40. See Inés San Martín, *Pope Francis Says There Can Be No Justice Without 'Social Rights'*, CRUX (June 4, 2019), <https://cruxnow.com/vatican/2019/06/pope-francis-says-there-can-be-no-justice-without-social-rights/>; Robert W. McElroy, *Pope Francis Brings a New Lens to Poverty, Peace and the Planet*, AM. MAG. (Apr. 23, 2018), <https://www.americamagazine.org/faith/2018/04/23/pope-francis-brings-new-lens-poverty-peace-and-planet>; *Pope to Jesuit Social Justice and Ecology Congress: Encourage Hope*, VATICAN NEWS (Nov. 19, 2019, 11:44 AM), <https://www.vaticannews.va/en/pope/news/2019-11/pope-jesuit-social-justice-ecology-secretariat-encourage-hope.html>.

41. See Michael M. Grynbaum & Sharon Otterman, *Mayor de Blasio Emerges as an Unexpected Champion of Religion*, N.Y. TIMES (Mar. 18, 2015), <http://www.nytimes.com/2015/03/19/nyregion/mayor-de-blasio-emerges-as-an-unexpected-champion-of-religion.html?r=0>; see also

parents, he notes that while his mother was raised Roman Catholic, she drifted from the church in the early 1920's.⁴² Similarly, Mayor de Blasio has remarked that religion, "was not a particular focal point" for his father.⁴³ As the *New York Times* reported of his childhood: "Growing up, Mayor Bill de Blasio was the only child on his block who did not attend Mass on Sundays. 'Everyone else was at church, and I wasn't,' he said . . . 'Some of the kids envied me.'"⁴⁴ Needless to say, de Blasio was not a fervent believer in the God of Abraham, Isaac, and Jacob.

However, de Blasio would be forced to spin this narrative regarding his secular upbringing towards the end of his 2013 mayoral campaign, when rumors surfaced that he was an "atheist," "anti-church," and a "closet socialist."⁴⁵ The *Daily News* for instance reported that, days before the polls were set to open, trucks promoting then-opponent Joe Lhota were circling the city repeating the phrase, "Bill de Blasio says he doesn't believe in churches—and he doesn't believe in God either," as people walked the streets.⁴⁶

At the time word of the mysterious propaganda vans broke out, Bill de Blasio was in the northeast Bronx visiting the Bay Eden Senior Center.⁴⁷ While his staff had alerted him that the buses were moving through the boroughs, he nonetheless decided to make a final appearance with prospective constituents the night before voting day.⁴⁸ Immediately after the visit, reporters swarmed de Blasio with questions about his religious beliefs, particularly in response to the allegations promulgated by the vans.⁴⁹ The future mayor responded swiftly and calmly stated "I'm not affiliated with any particular church. I do consider myself a spiritual person. . . . As I've said many times, I was very influenced by liberation theology, by Christian liberation theology in the work I did after college and after graduate school."⁵⁰

Sarah Pulliam Bailey, *Bill de Blasio, New York's New 'Spiritual But Not Religious' Mayor*, WASH. POST (Jan. 6, 2014), http://www.washingtonpost.com/national/religion/bill-de-blasio-new-yorks-new-spiritual-but-not-religious-mayor/2014/01/06/2e1c22b0-772c-11e3-a647-a19deaf575b3_story.html.

42. See Grynbaum & Otterman, *supra* note 41.

43. *Id.*

44. *Id.* (quoting Mayor de Blasio).

45. Jill Colvin, *Bill de Blasio Talks Religion in the Bronx*, OBSERVER (Nov. 4, 2013, 4:45 PM), <http://observer.com/2013/11/bill-de-blasio-talks-religion-in-the-bronx/>.

46. Celeste Katz, *Sound Truck Attack: Bill de Blasio Believes in Getting Free Babysitting, But Not Church*, N.Y. DAILY NEWS (Nov. 4, 2013, 6:14 PM), <http://www.nydailynews.com/blogs/dailypolitics/sound-truck-attack-bill-de-blasio-believes-free-babysitting-not-church-blog-entry-1.1697060>.

47. Colvin, *supra* note 45.

48. *Id.*

49. *Id.*

50. *Id.*

Significantly, Mayor de Blasio's understanding of liberation theology is not based on some mere and far-removed academic reflection, but is grounded in real life experience based on his work in Latin American communities. Those experiences are, in turn, wholly consistent with and indeed a true reflection of liberation theology's historical emphasis on the necessity and primacy of "action" to promote justice.⁵¹ Indeed, writing at the height of the liberation theology movement in the 1980's, Panamanian Pastor Phillip Berryman, built upon Gutiérrez's three claims by defining liberation theology as follows:

[Liberation theology is] (1) an interpretation of Christian faith out of the suffering and hope of the poor; (2) a critique of society and of the ideologies sustaining it; and (3) a critique of the activity of the church and of Christians from the angle of the poor.⁵²

The emphasis on the "activity" of the church lays bare liberation theology's fundamental concern for *action* on behalf of the Christian community to effect change that results in concrete social-economic and political reform.⁵³ The evolving mechanics for this activity, however, now focus less and less on the activity of the Catholic Church, and more and more on the work of secular institutions.⁵⁴ Irvine touches on this notion in discussing the "inter-religious encounter" as "the third challenge" of liberation theology.⁵⁵ Indeed, just as the globalization of liberation theology in an increasingly multi-faith society raises questions regarding the possibility of a uniquely Catholic response to suffering, so does it raise questions regarding the need for a purely religious response at all.

While most might argue—correctly—that reliance on secular institutions was precisely the problem that necessitated the liberationist response in the 1960s, that no longer holds true in contemporary culture. To begin, the pluralization of liberation theology has allowed for the inclusion of increasingly non-Catholic institutions as agents for change within the movement. Moreover, secular leaders of those institutions have the benefit of half a century of liberation theology from which to draw upon. Finally, some of those political leaders, as will be discussed, have been influenced by these theologies in a way that enables them to incorporate those teaching in their own work.

51. Daniel H. Levine, *Assessing the Impacts of Liberation Theology in Latin America*, 50 REV. POL. 241, 243 (1988).

52. BERRYMAN, *supra* note 6, at 205.

53. See, e.g., GUTIÉRREZ, *supra* note 1, at 5–12 (discussing theology as critical reflection on praxis).

54. See generally Andrew B. Irvine, *Liberation Theology in Late Modernity: An Argument for a Symbolic Approach*, 78 J. AM. ACAD. RELIGION, 921 (2010) (discussing the evolution of liberation theology).

55. *Id.* at 936–37, 939–40.

Harmonizing with these sentiments, Mayor de Blasio has explained that he is “very deeply influenced by liberation theology, which [he] learned a lot about in the years [he] worked on Latin America”⁵⁶ In particular, Mayor de Blasio visited Latin America several times during the late 1970’s and 1980’s, at a time when numerous Central American nations were engaged in civil wars and marginalized groups were participating in their own respective revolutions.⁵⁷ In 1987, for example, Mayor de Blasio worked with Catholic organizations such the Quixote Center, which organized a project called “The Quest for Peace,” focusing around development and humanitarian aid for Nicaraguans during its own civil war.⁵⁸ As member and Sister Maureen Fiedler observed, the Center “lived and operated in the spirit of liberation theology, the idea that we’re called to enact justice for the poor.”⁵⁹ Significantly, the Quixote Center remains a distinctly Catholic movement that remains committed to social justice and continues to “mobilize lay Catholics to advocate for equality and inclusivity in the Church.”⁶⁰ After witnessing the power that religious groups such as the Quixote Center had to effect change in Latin America, de Blasio brought the liberation theology mentality to his tenure as Public Advocate and, more recently, as Mayor of New York City.

IV. THE CASE STUDY

Overtime, Mayor Bill de Blasio’s experiential understanding of liberation theology as a social-economic movement evolved into a political ideology for effecting change. This theological growth occurred long before his election as mayor of New York City. A concrete example being his long-standing support of the Bronx Household of Faith, a Christian Church, which was embroiled in a string of lawsuits against the City during de Blasio’s time as Public Advocate. That saga, in turn, has its own history, which is worth exploring in order to fully understand de Blasio’s later involvement.

56. Jill Colvin, *Bill de Blasio Explains His ‘Liberation Theology,’* OBSERVER (Sept. 27 2013, 12:39 PM), <http://observer.com/2013/09/bill-de-blasio-explains-his-liberation-theology/#ixzz3Yc7C8sXj>.

57. Javier C. Hernández, *A Mayoral Hopeful Now, de Blasio Was Once a Young Leftist*, N.Y. TIMES (Sept. 22, 2013), <http://www.nytimes.com/2013/09/23/nyregion/a-mayoral-hopeful-now-de-blasio-was-once-a-young-leftist.html?pagewanted=all&r=0> (discussing Mayor de Blasio’s work during the 1980s).

58. *Mayor Bill de Blasio’s Faith: A ‘Spiritual But Not Religious’ Leader and Pioneer*, HUFFINGTON POST (Jan. 6, 2014, 5:44 PM), http://www.huffingtonpost.com/2014/01/06/bill-de-blasio-faith_n_4551104.html.

59. Bailey, *supra* note 41.

60. *Catholics Speak Out*, QUIXOTE CTR., <https://www.quixote.org/catholics-speak-out/>, (last visited Mar. 25, 2020).

A. *The Bronx Household of Faith Saga*

In 1995, pastors of the Christian church Bronx Household of Faith Robert Hall and Jack Roberts filed a request with a local Bronx school district to rent out the Merseau Middle School for “religious worship” on weekends.⁶¹ With an increase in membership and the need for a larger venue the pastors were eagerly looking for a suitable space at a reasonable price to conduct their Sunday services.⁶²

Shortly after filing all the necessary paperwork, however, the school district denied their request. It based its decision on New York City’s Standard Operating Procedural (“SOP”) Manual and the New York State Education Law, both of which prohibited the rental of school property for the purpose of “religious services or religious instruction.”⁶³ Viewing this as a form of religious discrimination, the pastors sued the school district claiming violations under the First and Fourteenth Amendments—claims they would ultimately lose at trial and on appeal before the Second Circuit in *Bronx I*.⁶⁴ The Supreme Court subsequently denied review,⁶⁵ and the church was left with no venue to hold its services.

In 2001, however, four years after *Bronx I*, the Supreme Court decided *Good News Club*,⁶⁶ which effectively overruled the earlier decision and propelled a sequence of cases spanning over a decade. In *Good News Club*, a Christian club brought a lawsuit against the Milford school district after its request to hold the Club’s weekly after school meetings at the school was denied.⁶⁷ Writing for the majority, Justice Thomas held that “when Milford denied the Good News Club access to the school’s limited public forum on the ground that the Club was religious in nature, it discriminated against the Club because of its religious viewpoint in violation of the Free Speech Clause of the First Amendment.”⁶⁸

Seizing the opportunity for a new argument that the New York City policy was viewpoint discriminatory, the Bronx Household of

61. See *Bronx Household of Faith v. Cmty. Sch. Dist. No. 10*, No. 95 Civ. 5501 (LAP), 1996 WL 700915, at *1 (S.D.N.Y. Dec. 5, 1996).

62. As Pastor Hall later remarked, the weekly meetings were intended to include the “singing of Christian hymns and songs, prayer, fellowship with other church members and Biblical preaching and teaching, communion, sharing of testimonies’ and a ‘fellowship meal’ that allows attendees to talk and provide ‘mutual help and comfort to’ one another.” *Bronx Household of Faith v. Bd. of Educ. of New York (Bronx III)*, 492 F.3d 89, 92 (2d Cir. 2007) (Calabresi, J., concurring) (citing First Affidavit of Robert Hall at 1).

63. See *Bronx Household of Faith*, 1996 WL 700915, at *1.

64. See *id.*, *aff’d*, *Bronx Household of Faith v. Cmty. Sch. Dist. No. 10 (Bronx I)*, 127 F.3d 207 (2d Cir. 1997).

65. *Bronx Household of Faith v. Cmty. Sch. Dist. No. 10*, 523 U.S. 1074 (1998).

66. See *Good News Club v. Milford Cent. Sch.*, 533 U.S. 98, 105–06 (2001) (discussing *Bronx I*).

67. *Id.* at 103–04.

68. *Id.* at 120.

Faith pastors re-applied for permission to rent the public school but were again denied.⁶⁹ The district court, however, cited to *Good News Club* and ruled in favor of Bronx Household, finding the denial to be clear viewpoint discrimination under the Free Speech Clause.⁷⁰ On appeal, the Second Circuit was bound by the recent Supreme Court decision and affirmed the decision in *Bronx II*.⁷¹ Consequently, beginning in 2002, the pastors were finally permitted to hold their “religious services” in a New York City public school.

Attempting to work around the Supreme Court’s decision in *Good News Club*, the school district (now the Board of Education) began a process to amend the SOP policy in order to ban “religious worship services” instead of “religious services.”⁷² The Board presumably reasoned that a narrower regulation would create a stronger Establishment Clause argument in the event the pastors sued them for a future denial.⁷³ Anticipating such a suit, the Board asked the district court to rule on the proposed regulation’s constitutionality under the First Amendment prior to its enactment. The district court agreed to hear the case in 2005, and Board ultimately prevailed on appeal in *Bronx III* in 2007.⁷⁴ The decision forced Bronx Household out of P.S. 15-291 where it had been conducting its Sunday services since the *Bronx II* decision in 2002.⁷⁵

B. Mayor de Blasio’s Involvement

When *Bronx III* was decided, Bill de Blasio was in his seventh year as a councilman in New York’s 39th district. While his agenda did not include advocacy on behalf of Bronx Household—as he did not represent that part of Brooklyn—this would soon change, upon his appointment to Public Advocate in 2010. In the interim, pastors Hall and Roberts began garnering support from the community to repeal Chancellor’s Regulation D-180, which had been adopted that same year and superseded the prior SOP policy. Regulation D-180 provided, in part, that “[n]o permit shall be granted for the purpose

69. See *Bronx Household of Faith v. Bd. of Educ. of New York*, 226 F. Supp. 2d 401, 403 (S.D.N.Y. 2002).

70. See *id.* at 423.

71. *Bronx Household of Faith v. Bd. of Educ. of New York (Bronx II)*, 331 F.3d 342, 353 (2d Cir. 2003) (finding the activities at issue in *Good News Club* “materially indistinguishable” from the Church’s proposed worship activities).

72. For a more detailed explanation, see *Bronx III*, 492 F.3d 89, 92 (2d Cir. 2007) (Calabresi, J., concurring).

73. The Supreme Court in *Good News Club* had rejected Milford’s Establishment Clause claim. 533 U.S. at 98. This led to the pastors’ victory in the Second Circuit.

74. See *Bronx Household of Faith v. Bd. of Educ. of New York*, 400 F. Supp. 2d 581 (S.D.N.Y. 2005), *vacated*, 492 F.3d 89 (2d Cir. 2007) (*per curiam*).

75. *History, BRONX HOUSEHOLD OF FAITH*, <http://www.bhof.org/history/> (last visited Apr. 4, 2020).

of holding *religious worship services*, or otherwise using a school as a *house of worship*.⁷⁶

In light of this development, pastors Hall and Roberts, along with several other church members and faith-based organizations, participated in a series of rallies and events opposing Chancellor's Regulation D-180 and calling for its termination.⁷⁷ In his new position as Public Advocate, Bill de Blasio wasted no time applying his liberationist understanding of social justice and joined these efforts.⁷⁸ Indeed, in his public capacity, de Blasio not only condemned the Board's actions, but went so far as to march arm in arm with faith-based groups across the Brooklyn Bridge as a sign of solidarity.⁷⁹ Pastor Hall recalled seeing de Blasio in one such rally, considering him to be "sympathetic" to their cause.⁸⁰

With the added support of de Blasio as Public Advocate, and a growing number of civil and religious organizations, the pastors brought a suit against New York City in 2010, challenging Regulation D-180 under the Free Speech clause of the First Amendment.⁸¹ In 2011, however, in what by now was a routine matter, the pastors won a preliminary injunction only to have the order reversed by the Second Circuit.⁸² They were again denied certiorari by the Supreme Court,⁸³ and were again left with no place to hold their services.

The new Bloomberg administration stood by the ruling, enforcing the ban and denying the Bronx Household of Faith, along with dozens of other faith-based organizations, permission to rent public schools.⁸⁴

76. N.Y.C. DEPT OF EDUC., CHANCELLOR'S REGULATIONS, D-180 §I (Q) (2010) (emphasis added), available at <https://www.schools.nyc.gov/docs/default-source/default-document-library/d-180-3-24-2010-final-combined-remediated-wcag2-0>.

77. See Lisa L. Colangelo, *De Blasio Will Revamp Rules Against Worship in School After U.S. Supreme Court Rejects Appeal From Bronx Church*, N.Y. DAILY NEWS (Mar. 30, 2015, 4:58 PM), <http://www.nydailynews.com/new-york/bronx/supreme-court-denies-church-public-school-article-1.2167126>; Grynbaum & Otterman, *supra* note 41.

78. Jordan Lorence, *Bill de Blasio, Champion of Religious Liberty: His New York Values Let Small Churches Hold Worship Services in Public-School Buildings*, N.Y. DAILY NEWS (Jan. 15, 2016, 4:15 PM), <https://www.nydailynews.com/opinion/jordan-lorence-de-blasio-champion-religious-liberty-article-1.2498402> ("When he was running for office in 2012, de Blasio attended pastor-led rallies that urged then-Mayor Bloomberg to repeal the policy.")

79. See Grynbaum & Otterman, *supra* note 41.

80. Colangelo, *supra* note 77.

81. *Bronx Household of Faith v. Bd. of Educ. of New York (Bronx IV)*, 650 F.3d 30, 33 (2d Cir. 2011).

82. *Id.* at 32–33.

83. *Bronx Household of Faith v. Bd. of Educ. of New York*, 585 U.S. 1087 (2011).

84. Billy Hallowell, 'State Religion': Bloomberg Defends NYC Policy Evicting Dozens of Churches from Public School Buildings, THE BLAZE (Feb. 13, 2012), <https://www.theblaze.com/news/2012/02/13/state->

The Department of Education spokesperson, Marge Feinberg, speaking for the administration, remarked: “Our view is that public school buildings, which are funded by taxpayers’ dollars, should not be used as houses of worship or to subsidize worship.”⁸⁵ As then-Mayor Michael Bloomberg later put it, “Someday the religion that the state picks as the ‘state religion’ might not be yours” . . . “The way to solve that is to not have a state religion.”⁸⁶ Neither Public Advocate de Blasio nor the pastors agreed with that view.

Ultimately, Pastors Hall and Roberts continued their efforts and, in the following year, began a fifth strand of the litigation to resolve their remaining Free Exercise and Establishment Clause claims.⁸⁷ Because the district court previously addressed those claims only with respect to the former SOP policy in the previous string of litigation, the subsequent revision banning “religious worship services” under the Chancellor’s Regulation necessitated separate consideration.

By this time, Mayor Bloomberg’s term was winding down and de Blasio was the front-runner in the 2013 mayoral election. On the campaign trail, de Blasio continued to echo his liberationist understanding of religious freedom in expressing his open support for Bronx Household and similar religious organizations.⁸⁸ These expressions included leading several marches in favor of allowing churches to rent public school space to hold their worship services.⁸⁹ Opposing the outgoing-mayor’s stance on the regulation, his efforts paid off. De Blasio went on to win the democratic primarily, and the overall election, in large part because of overwhelming support he received from religious organizations and faith-based groups.⁹⁰ All the while the pastors continued their litigation struggles, which was now in its fifteenth year.

In 2012, in a faint sign of hope, the district court granted summary judgment for the pastors on their Free Exercise claims.⁹¹ District Court Judge Preska adopted her prior reasoning from the 2005 case, and held that the ban on “religious worship services” in the Board of Education’s concededly “open forum” violated the Free

[religion-bloomberg-defends-nyc-policy-evicting-dozens-of-churches-from-public-school-buildings.](#)

85. *Id.*

86. *Id.*

87. *See* Bronx Household of Faith v. Bd. of Educ. of New York, 855 F. Supp. 2d 44, 46, 52 (S.D.N.Y. 2012).

88. *See* Lorence, *supra* note 78.

89. *See id.*

90. *See, e.g.,* Tony Carnes, *Protestants Loomed Large in the NYC Democratic Party Primary*, A JOURNEY THROUGH N.Y.C. RELIGIONS (Sept. 12, 2013), <http://www.nycreligion.info/protestants-largest-voting-block-nyc-democratic-party-primary/> (discussing “religion segment” voter turnout of for the 2013 democratic primary).

91. Bronx Household of Faith v. Bd. of Educ. of New York, 876 F. Supp. 2d 419, 445 (S.D.N.Y. 2012).

Exercise Clause because it targeted religion.⁹² She also held that the Board's mere fear of violating the Establishment Clause was not sufficiently compelling to justify the exclusion of religious activity, echoing the Supreme Court's reasoning in *Good News Club*.⁹³

Later that year, by a split decision, the Second Circuit reversed, taking, as it had in basically all the prior cases, the exact opposite view of the district court.⁹⁴ It held that the exclusion of "religious worship services" from public school did not constitute viewpoint discrimination, but, instead, was a content-based exclusion of all "religious worship" activity.⁹⁵ Contrary to Judge Preska's view, it added that the exclusion was justified by the Board's reasonable concern that permitting use of school facilities for such services would violate the Establishment Clause by causing both excessive entanglement between church and state and probable coercion of youth attending and residing near those schools.⁹⁶ In dissent, Judge Walker criticized the Court for abandoning the reasoning of *Good News Club*.⁹⁷ Closing the litigation aspect of this never-ending saga, the Supreme Court denied certiorari on that case in 2015.⁹⁸

C. *De Blasio's Influence as Mayor*

Within hours of the Supreme Court's decision to deny certiorari, Wiley Norvall, spokesman for the Mayor, issued the following statement:

The administration remains committed to ensuring that religious organizations are able to use space in city schools on the same terms provided to other groups.

Now that litigation has concluded, the city will develop rules of the road that respect the rights of both religious groups and nonparticipants.

While we review and revise the rules, groups currently permitted to use schools for worship will continue to be able to worship on school premises under [Department of Education] guidelines.⁹⁹

The de Blasio administration's decision to disregard the Second Circuit's ruling in the name of religious freedom left many

92. *Id.* at 440; *see also* *Bronx Household of Faith v. Bd. of Educ. of New York*, 400 F. Supp. 2d 581 (S.D.N.Y. 2005).

93. *See Bronx Household of Faith*, 876 F. Supp. 2d. at 435 (discussing *Good News Club* at n. 17).

94. *Bronx Household of Faith v. Bd. of Educ. of New York*, 750 F.3d 184 (2nd Cir. 2014).

95. *Id.* at 189.

96. *Id.* at 200.

97. *See generally id.* at 205–09 (Walker, J., dissenting).

98. *Bronx Household of Faith v. Bd. of Educ.*, 575 U.S. 946 (2015).

99. Colangelo, *supra* note 77.

commentators wondering if future litigation was inevitable.¹⁰⁰ In his position as mayor, however, de Blasio has been careful to avoid triggering lawsuits by avoiding changes to the actual policy—preferring instead to simply decline enforcement of that provision.¹⁰¹ All told, de Blasio’s ability to have the final say in this religious/state debate provides a clear example of the evolving influence of liberation theology as a movement that can be exercised by non-religious individuals who otherwise yield political power.¹⁰²

D. *Religious Freedom in School*

The Bronx Household litigation cases were merely the first in a line of cases in which the Mayor’s office has made it a point to defend religious liberty. Well into his second term as New York City mayor, de Blasio has built a reputation as an “unexpected champion for religion” by upholding the rights of religious groups ranging from Christians to Muslims to Jews.¹⁰³

During de Blasio’s tenure for instance new education guidelines were enacted that enabled Pre-K programs to separate time for religious devotion and prayer.¹⁰⁴ This came after several Jewish schools (“Yeshivos”) expressed concern over the school “instruction hour requirement” under Mayor de Blasio’s universal Pre-K program which they argued did not leave enough time for religiously related activities such as prayers and reading the Torah.¹⁰⁵ Rolled out in late 2015, the guidance signaled a fulfilled promise de Blasio had made in 2014. In that regard, the mayor had assured the city’s parochial schools that he would make pre-kindergarten accessible to all four-year-old in the city.¹⁰⁶ Notably, the new guidelines also allowed religiously affiliated programs to conduct class on federal holidays in order to take off on days of religious observance.¹⁰⁷

100. Will Hall, *Supreme Court Lets New York City Ban Churches, Mayor to Give Access Anyway*, CHRISTIAN EXAMINER (Mar. 31 2015), <http://www.christianexaminer.com/article/supreme-court.lets.new.york.city.ban.churches.mayor.to.give.access.anyway/48672.htm>.

101. *Id.*

102. Notably, in 2012, the New York State Senate Education Committee proposed an amendment—which never became law—to the State Education Law, which would have allowed religious groups to worship in public school after-hours across the state. See S. Res. 6087A-2011 (N.Y. 2012), available at open.nysenate.gov/legislation/bill/S6087A-2011.

103. See Grynbaum & Otterman, *supra* note 41.

104. Yochonon Donn, *NYC Easing Pre-K Scheduling to Accommodate Yeshivos*, HAMODIA (Feb. 17, 2015), <http://hamodia.com/2015/02/17/nyc-easing-pre-k-scheduling-accommodate-yeshivos/>.

105. *Id.*

106. *Id.*

107. See Sharon Otterman, *New York City Eases Pre-K Rules to Allow Prayer Breaks*, N.Y. TIMES (Feb. 18, 2015), <http://www.nytimes.com/2015/02/19/nyregion/new-york-city-eases-pre-k-rules-to-allow-prayer-breaks.html>.

Beyond that, in another move that made headlines nationwide, de Blasio successfully pushed for New York City to become the first major metropolis to close schools on two Muslim holidays—Eid al-Fitr and Eid al-Adh.¹⁰⁸ Pointing to the rationale as simply “a matter of fairness,” the push came after Bloomberg’s administration rejected the proposal arguing that kids needed more school not less.¹⁰⁹ Mayor de Blasio, however, noted that the modification was “a common-sense change,” and “one that recognizes our growing Muslim community and honors its contributions to our city.”¹¹⁰

V. CONCLUSION

Mayor Bill de Blasio has solidified his mark as a “champion of religion.”¹¹¹ That title speaks to numerous concrete examples where he has advocated for religious tolerance, acceptance, and accommodation. Those ideas, in turn, flow directly and unapologetically from his experiences with liberation theology during his time in Latin America. Though critics may cast Mayor de Blasio’s use of liberation theology in the public sphere as an anomaly, there are signs that point to a growing practice. For example, when Congresswoman Alexandria Ocasio-Cortez, also a New York native, won her primary on a Democratic Socialists of America platform, one of her first acts was to publish a piece in the *America Magazine* “linking her left politics to her Christian faith.”¹¹² Thus, this politically-driven theology represents an innovative layer of the liberation movement in which non-Christians leaders in political space can learn from and apply theologies for the betterment of society as a whole.

108. Michael M. Grynbaum & Sharon Otterman, *New York City Adds 2 Muslim Holy Days to Public School Calendar*, N.Y. TIMES (Mar. 4, 2015), <http://www.nytimes.com/2015/03/05/nyregion/new-york-to-add-two-muslim-holy-days-to-public-school-calendar.html> (quoting Mayor de Blasio).

109. *Id.*

110. Greg Botelho, *New York City Public Schools to Have Muslim Holidays Off*, CNN (Mar. 4, 2015), <http://www.cnn.com/2015/03/04/us/new-york-muslim-school-holidays/> (quoting Mayor de Blasio).

111. Grynbaum & Otterman, *supra* note 41.

112. Miller, *supra* note 8; Alexandria Ocasio-Cortez, *Alexandria Ocasio-Cortez on Her Catholic Faith and the Urgency of Criminal Justice Reform*, AM. MAG. (June 27, 2018), <https://www.americamagazine.org/politics-society/2018/06/27/alexandria-ocasio-cortez-her-catholic-faith-and-urgency-criminal>.