RELIGION AND ARGUMENTS FROM SILENCE

ZACHARY MILSTEAD
UNIVERSITY OF OKLAHOMA

Abstract. Arguments from Silence have been used many times in attempts to discredit the foundations of religions. In this project, I demonstrate how one might judge the epistemic value of such arguments. To begin, I lay out for examination a specific argument from silence given by Walter Richard Cassels in his work Supernatural Religion. I then discuss a recently developed Bayesian approach for dealing with arguments from silence. Finally, using Cassels's work and the work of some of the critics who replied to his argument, I argue for what probabilities might be applied in the use of the Bayesian method for testing the epistemic value Cassels's argument and demonstrate how one might respond to similar arguments.

I. INTRODUCTION

The English clergyman Henry Kett once noted that “while nothing is more easy, than to bring forward a multitude of objections in a very small volume, it is absolutely impossible to answer them within the same compass”.¹ The argument from silence is a popular form of argument of the sort used historically in attempts to discredit religion. Such arguments are often used in the manner to which Kett referred. The use of this style of argumentation against Christianity was certainly common in the Victorian era.

Critics of orthodox Christianity such as Edward Gibbon, David Friedrich Strauss, and Walter Richard Cassels all made use of the argument from silence and met with criticism as a result of its use. Lest we suppose that this is merely a historical issue, consider the following arguments given by contemporary New Testament scholar, Bart Ehrman. In his book How Jesus Became God (2014), Ehrman advances various arguments regarding specific views concerning the deity of Jesus as held by the authors of the Synoptic Gospels, i.e., Matthew, Mark, and Luke. He argues that, contrary to later commonly held Christian beliefs, the gospel writers did not believe that Jesus pre-existed as a divine being prior to his birth and later exaltation.²

Regarding Mark, he notes:

[Jesus] was already adopted to be God’s Son at the very outset of his ministry, when John the Baptist baptized him. This appears to be the view of the Gospel of Mark, in which there is no word of Jesus’s pre-existence or of his birth to a virgin. Surely if this author believed in either view, he would have mentioned it [my italics]…³

Likewise, regarding the views found in Matthew and Luke, he tells us:

I should stress that these virginal conception narratives of Matthew and Luke are by no stretch of the imagination embracing the view that later became the orthodox teaching of Christianity. According to this later view, Christ was a pre-existent divine being who ‘became incarnate through the Virgin Mary.’ But not according to Matthew and Luke. If you read their accounts closely, you will see that they have nothing to do with the idea that Christ existed before he was conceived [or they did not say anything about it]. In

¹ Henry Kett, History of the Interpreter of Prophecy (Hanwell&Parker, 1799), 4.
³ Ehrman, How Jesus became God, 238.
these two Gospels, Jesus comes into existence at the moment of his conception. He did not exist before [or at least the writers do not say that he existed before].

Finally, summarizing both of these arguments, he states:

I have already made the case that the followers of Jesus were not calling him God during his lifetime and that he did not refer to himself as a divine being who had come from heaven. If they had done so, surely there would be a heavy dose of such views in our earliest records of his words [italics mine]—in the Synoptic Gospels and their sources (Mark, Q, M, and L).

It should be quite clear at this point, that Ehrman uses arguments from silence of the sort with which we are concerned. As Kett said, however, it is much easier to provide arguments than it is to respond adequately to them.

Although arguments from silence often seem suspect, they are difficult to formalize and pose a challenge in demonstrating where precisely the fallacy lies. In this project, I demonstrate how one might judge the epistemic value of such arguments. I begin by laying out for examination a specific argument from silence given by Walter Richard Cassels in his work *Supernatural Religion*. (Cassels’s argument includes an extra layer of complexity that we do not see in arguments like Ehrman’s and provides a unique opportunity to develop a formal analysis for addressing this complexity.) I then discuss a recently developed Bayesian approach for dealing with arguments from silence. Finally, by using Cassels’s work and the work of some of his critics, I suggest an expansion of the Bayesian method of testing epistemic value that we can follow to assign probabilities for evaluating arguments similarly formulated to the one given by Cassels and I demonstrate an evaluation of Cassels’s argument.

II. CASSELS’S ARGUMENT

In his influential work *Supernatural Religion*, Walter Richard Cassels raises various arguments against the foundations of orthodox Christianity. One argument that garnered interest and responses from supporters of Christianity and opponents alike was his argument regarding the silence of the church historian, Eusebius.

Because so little of the writings of the first and second century have survived, Eusebius’s great work *Historia Ecclesiastica* is of tremendous importance. In it, Eusebius lists, mentions, and quotes many works to which historians no longer have access. Of particular interest to Cassels is what Eusebius says (or does not say) regarding the church father Papias of Hierapolis. Based on what he finds about Papias in the work of Eusebius, Cassels arrives at the conclusion that Papias did not know any of the Gospels that we recognize today. According to Cassels, Papias had access to two Gospels that are similar to the canonical Gospels of Matthew and Mark, and he was not even aware of the Gospels of Luke and John.

J. B. Lightfoot, in his examination of Cassels’s work, pulls together the general conception of the argument in the following quotations:

Eusebius, who never fails to enumerate the works of the New Testament to which the Fathers refer, does not pretend that Papias knew either the Third or Fourth Gospels.

He continues later:

4  Ibid., 243.
5  Ibid., 249.
6  Unfortunately, arguments of this sort have a tendency of being recycled and reused. Fortunately, this Bayesian approach provides a means of addressing any simple reformulations of arguments of this sort.
Had he [Papias] expressed any recognition of the Fourth Gospel, Eusebius would certainly have mentioned the fact, and this silence of Papias is strong presumptive evidence against the Johannine Gospel.9

Finally, he concludes:

The presumption therefore naturally is that, as Eusebius did not mention the fact, he did not find any reference to the Fourth Gospel in the work of Papias.10

In other words, a somewhat simplified version of the argument might go something like this:

(1) If Papias were aware of the Gospels as we know them (especially Luke and John), then Eusebius would have mentioned this in his works.

(2) Eusebius does not mention this in his works.

Therefore,

(3) Papias was not aware of the Gospels as we know them (especially Luke and John).

(4) Because he was a bishop and was aware of what was going in Christianity during his day, if Papias was not aware of those Gospels, then either they did not exist at the time or they were not yet regarded as authoritative.

Therefore,

(5) The Gospels as we know them (especially Luke and John) either they did not exist at the time or they were not yet regarded as authoritative.11

Ultimately, it seems Cassels would have us conclude that there is good reason to believe that the Gospels as we know them (especially Luke and John) should not be considered authoritative. Obviously, one might raise some concerns over this formulation of Cassels’s argument, but the version outlined above appears to be an adequate interpretation of what scholars generally understood that he was attempting to convey. Unfortunately, arguments of this sort do not really lend themselves to deductive formulation.

III. ARGUMENTS FROM SILENCE: A BAYESIAN APPROACH

In his article “The Argument from Silence” (2014), Timothy McGrew notes the historical disagreement over the value and usefulness of arguments from silence.12 He points out, however, that in spite of the various differing opinions regarding arguments of this sort, there has been little philosophical analysis related to the argument form itself. McGrew notes there are a number of complexities involved with such arguments. In addition to similarities with arguments from ignorance caused by the absence of expected evidence from a source (or sources), there are also issues related to testimony that are of consideration.

In an article raising related concerns regarding arguments from silence, John Lange13 notes similar complexities with such arguments. Historians would generally agree that, if certain requirements were met, an argument from silence would be conclusive. Building off of these requirements, Lange attempts to determine whether it is the case that such an argument could be formalized into a valid deductive

10 This quotation is provided by Lightfoot (Essays on the Work Entitled ‘Supernatural Religion’ (Macmillan and Co, 1893), 35) from the 2nd edition of Cassels work. In later editions, the wording was changed slightly in apparent response to Cassels’s critics. In the 4th edition the text reads, “This presumption is confirmed by the circumstance that when Eusebius writes, elsewhere (H. E. iii. 24), of the order of the Gospels, and the composition of John’s Gospel, he has no greater authority to give for his account than mere tradition” (Cassels, Supernatural Religion, 323).
11 It is worth noting that Cassels’s argument also relies upon comments (and lack thereof) by Hegesippus and Dionysius of Corinth, which follow similar lines to his use of Papias. For the purpose of this project, I will limit discussion to Papias though the same issues that arise with Papias arise for Hegesippus and Dionysius.
In a conclusion similar to McGrew’s, Lange states that a probabilistic version of arguments of this sort would need to be developed in order for it to be properly evaluated. He notes that there are, of course, some challenges for how we might arrive at the probabilities needed for such an argument. Lange states:

It will be difficult, if not impossible, to determine the empirical probabilities involved. E is a given historical event, or an alleged event, and may be the only event of its type, or the only event conceived of its type. Consequently, whereas we might suppose that, given E’s occurrence, there would be some objective probability that our historian would know of some report of E, it may be impossible to determine what that probability would be, even, in fact, whether it would be favorable or unfavorable.15

While this is true regarding objective probabilities, it does not mean that we cannot use a reasonable range of the strongest and weakest probabilities that can be granted in order that we might gain a close estimate of the strength of the argument. Lange seems to acknowledge this by noting, “[H]istorians must continue to rely on their hunches, on their subjective estimations of likelihood”16.

Fortunately, a probabilistic formulation can be developed with some basic assumptions. Let ¬E be the absence of expected evidence and H be that the event occurred. Given this, the argument can be set up using the odds form of Bayes’s Theorem17 as:

\[
\frac{P(\neg H|\neg E)}{P(H|\neg E)} = \frac{P(\neg H)}{P(H)} \times \frac{P(\neg E|\neg H)}{P(\neg E|H)}
\]

The difficulty here is finding probabilities that adequately represent the situation. McGrew has provided some useful questions (similar to those considered by Lange for establishing a conclusive argument), which can be asked to lend intuitive guidance for developing some reasonable numbers to place in the formula.

McGrew notes that, in regard to arguments from silence, it is important to know whether E would be very probable given that H were true. Using a formulation of arguments from ignorance as a guide, he develops three questions that should be considered:

\(Q_1\): If H (the event or fact in question) were true, how probable is it that the author in question would have noticed it (N)?

\(Q_2\): If H were true and the author had noticed it, how probable is it that he would record it (R)?

\(Q_3\): If H were true, and the author had both noticed and recorded it, how probable is it that this record would have survived and that contemporary historians would be aware of it (S)?18

More formally, these questions can each be symbolized respectively as P(N|H), P(R|H&N), and P(S|H&N&R). McGrew clarifies the importance of this by noting, “Since (N&R&S) entails E, we can approximate the critical value P(E|H) by the product P(N|H) × P(R|H&N) × P(S|H&N&R), noting that this is equivalent to P(N&R&S|H), which in turn must be less than or equal to P(E|H).”19

In order to remove some of the abstract nature of this formal argument, we can apply various tentative numbers for calculation to see the what probabilities would be necessary for a rational agent to be moved by conditionalization from a probability for ¬H of .5 to something of higher odds. (And indeed, McGrew provides some examples.) With each of the three terms at a probability of .9 the shift of the probability for ¬H of .5 would increase to .79. However, if each were at .67, the conditionalization would not even shift the probability from .5 to .6. An argument with such low probabilities would have very little force at all. This gives us some idea of what should be expected in the case of Cassels’s argument.
IV. WALTER CASSELS, MEET THE REVEREND BAYES

McGrew's approach proves to be quite useful in assessing arguments similar to Ehrman's arguments mentioned previously. There is, however, another layer of complexity to Cassels's argument, which J. B. Lightfoot notes quite aptly in his examination of Cassels's work. He observes:

But in the case of Eusebius the application of the principle takes a wider sweep. Not only is it maintained that A knows nothing of B, because he says nothing of B; but it is further assumed that A knows nothing of B, because C does not say that A says anything of B.

What Lightfoot has pointed out is that, in regard to Cassels's argument, it is not simply that we are concerned with the probabilities of Papias noticing that it was the case that the Gospels of John and Luke were authoritative, the probability of him recording this fact, and the probability of his record surviving so that historians would be aware of it. We must also ask what the probability was that Eusebius would have noticed this about Papias, the probability that Eusebius would have recorded it, and the probability that this record would have survived for historians to be aware of it.

Given such considerations, we can still rely on McGrew's model as a starting point. The components of the formal argument, however, will require some expansion. McGrew's original formulation uses a single instance for N, R, and S, which will not suffice to assess Cassels' argument. We must not only assume that E entails the probabilities related to the work of Papias, but also the probabilities related to the work of Eusebius. Fortunately, the probability calculus allows for a revision to meet this requirement. Assuming that N, R, S are probabilities related to the work of Papias and N, R, S are probabilities related to the work of Eusebius, we can say that the probabilities related to Q1, Q2 for the works of Papias and Eusebius are each represented by P(N|H), P(R|H&N), P(S|H&N&R), P(N|H&N&R&S), P(R|H&N&R&S), P(S|H&N&R&S), and P(S|H&N&R&S). In this case (N & R & S & N & R & S) entails E and we can approximate the value of P(E|H) by the product

\[ P(N|H) \times P(R|H&N) \times P(S|H&N&R) \times P(N|H&N&R&S) \times P(R|H&N&R&S) \times P(S|H&N&R&S) \]

which must be less than or equal to P(E|H).

Prior to attempting to consider approximate probabilities that should be applied to these six terms, we can tentatively examine what the strength of Cassels's argument may (or may not) be by inserting a range of higher and lower probabilities. Suppose the probabilities of the terms are all extremely high, say .95 for each of the terms, the conditionalization from a probability of .5 for ¬H to a probability of almost .79 would be quite a convincing change in odds. If the probabilities are decreased across the board to .6 for each of these terms, which is not a low probability when considering what might move a rational agent, the outcome of conditionalization from the probability of ¬H is quite damaging to the strength of the argument. The resulting probability upon conditionalization is barely above the initial probability of .5 (. = .507) and would essentially demonstrate the argument has no real force. These numbers are, nonetheless, quite arbitrary and we must look at what evidence is available to provide something more substantial that can be used for weighing the strength of this argument.

IV.1 Q1: The probability of H's being noticed?

The first question that we must deal with for both Papias and Eusebius is in regard to the probability of each of them noticing whether the Gospels of Luke and John were considered authoritative in the early church. Let us begin with what can be gathered about Papias in regard to this question.

---

20 Lightfoot, Essays on the Work Entitled ‘Supernatural Religion,’ 34.
Cassels makes note that Papias was Bishop of the church at Hierapolis in the first half of the second century and, though he probably did not have direct contact with any of Jesus’ disciples, “he received their doctrines from those who had personally known them.”\(^{23}\) Sanday notes similarly, “Papias may be described as ‘an ancient and apostolic man,’ and appears to have deserved the title.”\(^{24}\) In addition, it is noteworthy that “Papias was of Hieropolis, a town in the neighbourhood of Ephesus, from whence the Gospel of St. John was sent forth [supposedly, as far as the argument is concerned]; and the earliest record we have about the martyrdom of Papias sets it down about the same time as that of Polycarp, i.e., about A.D. 160.”\(^{25}\) (Polycarp was a pupil of John and it is noteworthy that Papias was a contemporary.) Assuming that what Justin Martyr described regarding the early church, “on the day called Sunday, all who live in cities or in the country gather together to one place, and the memoirs of the apostles or the writings of the prophets are read, as long as time permits” (First Apology, Ch. 67), then it is very likely that Papias was aware of the writings that were considered authoritative by early Christians and he would have noticed if the Gospels of John and Luke were considered authoritative. Cassels and his critics would agree on this point.

In regard to the probability that Eusebius would have noticed if the Gospels of John and Luke were considered authoritative, the results are rather similar. Eusebius would eventually become the bishop of Caesarea Maritima (ca. AD 313). He was the student of the presbyter and scholar Pamphilus. Pamphilus’s studies focused mainly on the sacred texts and the works of Origen.\(^{26}\) His books formed the core of the greatest Christian library of Late Antiquity, the episcopal collection at Caesarea, which Eusebius continued to expand during his lifetime. It is evident from his writings that Eusebius had access to a vast number of Christian writings that are no longer extant. Lightfoot notes, “To Eusebius we are indebted for almost all that we know of the lost ecclesiastical literature of the second century. This literature was very considerable.”\(^{27}\) Though he was farther removed than Papias from the apostles and those who knew them, it still seems that Eusebius was also in a very good position to notice which writings were considered authoritative by the early Church. Due to this, his vocation, and scholarly pursuits, it is highly probable that he would have noticed if the Gospels of John and Luke were considered authoritative.

For the probability related to this first question for both Papias and Eusebius, there seems to be a sufficient amount of evidence to assign a relatively high number. The evidence given could charitably justify a probability between .8 and .95 for both \(P(N_P|H)\) and \(P(N_E|H \& N_P \& R_P \& S_P)\). Despite this, there is still much evidence that must be provided for this argument to be considered successful.

### IV.2. Q2: The probability of \(H\)’s being recorded?

Cassels is quite convinced that Papias and Eusebius would both have recorded something regarding the Gospels of John and of Luke. He notes, “Eusebius, who never fails to enumerate the works of the New Testament to which the Fathers refer, does not pretend that Papias knew either the Third or Fourth Gospels.”\(^{28}\) Later he continues, “Had he [Papias] expressed any recognition of the Fourth Gospel, Eusebius would certainly have mentioned the fact, and this silence of Papias is strong presumptive evidence against the Johannine Gospel.”\(^{29}\) On this point, Tischendorf, Sanday, and Lightfoot disagree with Cassels. Tischendorf and Lightfoot offer good reasons that a high probability should not be assigned to \(H\) for Q2.

Cassels makes the assumption that the only reason Papias and Eusebius would refrain from recording anything about the third and fourth Gospels is if they did not know about them. That is quite an

\(^{23}\) Cassels, Supernatural Religion, 446–47.


\(^{25}\) Constantin v. Tischendorf, When Were our Gospels Written? (Religious Tract Society, 1867), 108.


\(^{27}\) Lightfoot, Essays on the Work Entitled ‘Supernatural Religion’, 32.

\(^{28}\) Cassels, Supernatural Religion, 483.

\(^{29}\) Ibid., 322.
inherent leap. There are numerous possible reasons, besides the one Cassels assumes, they might not mention these Gospels and some much more probable reasons for not recording anything about this fact.

Lightfoot and Tischendorf take slightly different approaches in dealing with this issue. Lightfoot, for example, notes, “With Papias and Hegesippus and Dionysius of Corinth, any one is free to indulge in sweeping assertions with little fear of conviction; for we know nothing, or next to nothing, of these writers except what Eusebius himself has told us”. He then moves on to deal with what can be said of Eusebius. Tischendorf, on the other hand, thinks that more can be said about Papias even from the little that Eusebius has written. He tells us, “we have no right to conclude, from Eusebius’s extracts out of Papias’s book, that there was no reference to St. John’s Gospel [and likewise for Luke’s Gospel] in the entire book”.

Eusebius reports that Papias wrote five books in which he recorded ‘sayings of the Lord’. These he gathered from oral traditions of older Christians of the time. He was explicitly attempting to trace down words that were passed down via testimony rather than seek out what was held in written works. His design was to gather sayings that could be traced back to the Apostles. Of these five books written by Papias, Eusebius only gives us excerpts that he considers worth noting. From this we can draw some quick inferences. The first is that we are missing much of what Papias said and it is possible that in the missing works he mentions the third and fourth Gospels. Second, given what we have learned about the motive behind Papias’s work, we have no reason to believe he would give any mention of the Gospels of John and Luke since that would obviously lie outside of his area of research. Recall, he was not seeking out written accounts but was attempting to collect and record ‘words of the elders’ regarding what the disciples had said to them. Records such as the written Gospels of John and Luke (even if they were considered authoritative) were of no interest to his research due to the scope of his project.

Taking the line of argument followed by Lightfoot, our attention would be drawn more towards the work of Eusebius and the end he attempts to achieve in his work. The project Eusebius set forth to accomplish was not the capture and catalog of all those books the Church considered canonical. It was, rather, to provide information useful for “forming correct views respecting the Canon of Scripture”. Because of this, he would have little interest in references or quotations, which serve only in establishing the authority of books no one would question or dispute as being part of the Canon. For his purposes, it was absolutely pointless in proving those books or writings the Church already recognized. (Only the four Gospels, the Acts of the Apostles, and the Epistles of Paul would fall under this qualification.)

Regarding these recognized books, Eusebius only found it useful to note anecdotes related to the circumstances of their writing, such as those provided by Papias (regarding the Gospels of Matthew and Mark) and Irenaeus (regarding the four Gospels). All other works Eusebius examines fall outside of this category. For the general epistles, Hebrews, and Revelation he examines every account he can that might support or call into question their genuineness. For those books that clearly fall outside of the canonical tradition but were treated with great respect, such as the Shepherd of Hermas or the Gospel according to the Hebrews, he records their use by early church fathers.

Lightfoot provides an extensive and thorough argument showing Eusebius had no need to record that the Gospels of John and Luke were authoritative because that was not his intent. Given that it appears quite clear that it was also not the intent of Papias to record the authoritative status of these two gospels, it seems highly unlikely that either Eusebius or Papias would record this fact about the two Gospels. On this basis, regarding the probability related to the question of recording the fact for both Papias and Eusebius, there appears to be good evidence to assign a relatively low number to the probabilities.

31 Tischendorf, When Were our Gospels Written?, 109.
32 Tischendorf provides a more detailed account of the project of Papias, Tischendorf, When Were our Gospels Written?, 98–111.
33 Lightfoot astutely notes that Eusebius’s intentions are not clearly stated, but by following his method we can easily infer what his goals are from his procedure, Lightfoot, Essays on the Work Entitled ‘Supernatural Religion’, 46–47.
34 Ibid., 46.
Anything close to .5 seems much too high. A charitable probability would lie somewhere between .1 and .4 at best for both $P(R_p|H&N_p)$ and $P(R_{p_e}|H&N_{p_e}&R_p&S_p&N_{p_e})$.

**IV.3 Q3: The probability of the record of H's surviving?**

We finally arrive at the final (and what proves to be the most challenging) question for those seeking to make use of arguments from silence from historical documents. In Cassels case the question would be, if it were true that the Gospels of John and Luke were considered authoritative by the early church, how probable is it that a record by Papias would have survived and that contemporary historians would be aware of it? Likewise, how probable is it that a record by Eusebius of this would have survived and that contemporary historians would be aware of it? At this point, a proponent of Cassels would likely want to say, “Ah! But Eusebius was the historian who needed to be aware of what Papias recorded.” And actually, based on the way the argument is set up, this is quite true.

Eusebius tells us that Papias wrote five books as a part of his *Collection of the Sayings of the Lord*. Of those five books, we only have the excerpts that are found in what Eusebius has recorded. That Eusebius would have had access to all five of them is likely. Likewise, how exceptional this access was, given that Papias would have finished his work approximately 200 years before Eusebius wrote his *Historia Ecclesiastica*, is unclear. To say whether it was quite easy or quite hard for Eusebius to have had access to Papias’s writings is difficult. Even if Papias did not record something regarding the status of the Gospels of John and Luke within those five books, there is a decent chance Eusebius had access to some other work of Papias of which we have no knowledge. For argument’s sake, let us assume that there is at least a .5 probability and as much as a 1 probability of a work of Papias having survived to the time of Eusebius. For the sake of charity, we can use the higher number in our final calculations, but first we must consider probabilities regarding a record by Eusebius having survived.

The situation becomes much more difficult when we are talking about a document from the mid fourth century surviving until today. Weather, wars, natural disasters, and the general progression of life over a long period of time have not been friendly to ancient documents. Of the 1000 scrolls like the ones found at Qumran, scholars estimate that there could have been as many as 200,000. That is a .005 probability of such a scroll surviving for contemporary historians to examine it. The rate is slightly higher for ancient Greek documents. There is about a .025 probability of such documents surviving. For the sake of argument, let us assume that the probability of survival for documents of the sort that we are concerned with is tenfold that of ancient Greek documents.

We can now complete a final calculation. The final numbers we have estimated based on the evidence are as follow:

- $P(N_p|H) = .95$
- $P(R_p|H&N_p) = .4$
- $P(S_p|H&N_p&R_p) = 1$
- $P(N_{p_e}|H &N_p &R_p &S_p) = .95$
- $P(R_{p_e}|H&N_{p_e}&R_{p_e}&S_{p_e}&N_{p_e}) = .4$
- $P(S_{p_e}|H&N_{p_e}&R_{p_e}&S_{p_e}&N_{p_e}&R_{p_e}) = .25$

Hopefully, the discussion above should serve to demonstrate the value of the Bayesian solution for analyzing arguments from silence and the relative ease with which such analysis can be expanded in cases of increased complexity in the arguments under consideration. As we have seen in the examples from the

---

work of Bart Ehrman, the need for evaluation arguments from silence is not limited merely to historical works. Quite obviously, such evaluation is relevant to arguments in contemporary writings as well.\textsuperscript{36}

**BIBLIOGRAPHY**


\textsuperscript{36} Acknowledgements: This paper benefited greatly from discussion with members of a seminar at Western Michigan University, conversation and discussion with Jacob Milstead, and the thoughtful comments and suggestions of an anonymous referee of this paper. I am grateful to Timothy McGrew at Western Michigan University, most of all, for introducing me to this topic and providing helpful comments and direction on the early research for this paper.