

## The ‘Transgressor’ and the ‘Curse of the Law’: The Logic of Paul’s Argument in Galatians 2–3

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The nearly three decades since the publication of E. P. Sanders’s work on Paul and Judaism have witnessed a spate of new proposals for reading Gal 3.10, one of the most difficult and contested passages in Paul’s letters. For some, the ‘traditional’ interpretation is still preferred, though the ‘exile/restoration’ reading has gained some momentum recently. The following article will critique both of these readings, proposing a new interpretation of this passage, one that regards Paul as citing Deut 27.26 in continuity with its meaning in its narrative setting and that finds an interpretive grid in the logic he unfolds in Gal 2.15–21.

It is fairly customary to say that Gal 3.10, along with its surrounding context, is among the two or three most difficult passages in the Pauline corpus.<sup>1</sup> Paul’s argument appears quite cryptic and his compressed logic often leaves interpreters frustrated, since this is a critical text in the current crossfire between proponents of ‘traditional’ and ‘new perspective’ readings with regard to the problem of Paul and the Mosaic Law.<sup>2</sup> While the ‘traditional’ interpretation

<sup>1</sup> See, for example: ‘There are several passages of which one might say, not least when addressing a student audience, that “this is one of the most complicated and controverted passages in Paul.” But Gal 3.10–14 must surely be well up the list in the battle for any such accolade’ (N. T. Wright, *The Climax of the Covenant* [Minneapolis: Fortress, 1992] 137). James Dunn states that this ‘is one of the most difficult to follow that Paul ever dictated’ (J. D. G. Dunn, *The Theology of Paul’s Letter to the Galatians* [Cambridge: Cambridge University, 1993] 83). According to Bruce Longenecker, ‘If a survey were taken among professional students of Paul asking them to identify and rank the most difficult passages in the Pauline corpus, one might well expect Gal. 3.10–14 to appear among the most frequently and highly ranked passages’ (Bruce W. Longenecker, *The Triumph of Abraham’s God: The Transformation of Identity in Galatians* [Nashville: Abingdon, 1998] 134).

<sup>2</sup> The recent history of this debate has been well-rehearsed, and will not be repeated here. See Andrew H. Wakefield, *Where to Live: The Hermeneutical Significance of Paul’s Citations from Scripture in Galatians 3.1–14* (AcBib 14; Atlanta: Society of Biblical Literature, 2003) 11–56; Stephen Westerholm, *Perspectives Old and New on Paul: The “Lutheran” Paul and His Critics* (Grand Rapids: Eerdmans, 2004) 101–258; A. Andrew Das, *Paul and the Jews* (Peabody, MA: Hendrickson, 2003) 1–16.

recently has been reasserted,<sup>3</sup> scholars are increasingly skeptical in light of its many difficulties. Despite its historical pedigree, one is compelled to agree with N. T. Wright's judgment that the recent flurry of proposed interpretations of this text has 'been caused by a sense that the traditional reading does not quite work, does not quite fit the words that Paul actually used'.<sup>4</sup>

This article will offer a new interpretation of the curse of the Law in Gal 3.10 and will argue that Paul is employing a rhetorical argument, contending that those in Galatia who claim that discipleship to Jesus Christ must be carried out *within* the boundaries of the Law are simultaneously holding to two mutually exclusive confessions. As a result, in their attempt to avoid being 'sinners' like the gentiles (Gal 2.17), they actually end up being 'transgressors' of the Mosaic Law (2.18), thereby incurring its curse (3.10). His argument, therefore, is a rhetorical device whereby he persuades his readers that his opponents' teaching is untenable and must be abandoned.

### 1. Methodological Considerations

The proposal offered here emerges from a reconsideration of the relationship between the assertion of Paul in 3.10a and his citation of Deut 27.26 in 3.10b. On the traditional interpretation, the relationship between the two halves of this verse is highly torturous, with Paul's citation of Deut 27.26 *contradicting* his assertion in v. 10a.<sup>5</sup> That is, he claims in v. 10a that all those who advocate faithfulness

to the Mosaic Law are accursed, and he substantiates this with a quotation from Deuteronomy in v. 10b stating that those who fail to remain faithful to the Mosaic Law are under a curse.

Recognizing this difficulty, proponents of the traditional reading claim that Paul is building his case on an implied premise – that all who rely on the works of the Law do not observe and obey all the things written in the Law, since the Law demands perfection, which no human can render.<sup>6</sup> This interpretive move, while common, has been subjected to intense criticism and is highly questionable. As many scholars have pointed out, the Law did not demand sinless perfection, but faithfulness.<sup>7</sup>

This is not to say that it is impossible that Paul could have been claiming that the Law demanded perfect obedience, but it is highly unlikely that, if he were doing so, he would have left such a contentious claim *unstated*, since this would seem to require, at least, to be stated explicitly, and, more likely, elaborate argumentation. According to Andrew Das, Paul 'omits the key premise' and 'leaves it to the Galatians to figure it out for themselves'.<sup>8</sup> It is extremely improbable, however, that, in this highly polemical letter, Paul would have left such a contentious assertion *implicit*. Such a premise – even if it were clearly articulated – would have been rejected by all the groups involved in this dispute – the teachers in Galatia, the Jerusalem leaders, and, very likely, the Galatians themselves. If Paul were to assume any of the premises upon which he built his argument, surely they would have been widely agreed-upon notions, such as the oneness of God (cf. Gal 3.20), or the reality of the death and resurrection of Jesus Christ. But he would not have assumed, or have left unstated, *something for which he was arguing*, or an issue upon which there would be no agreement.

To attempt to ameliorate the difficulty created by the traditional reading by claiming that Paul's argument rests on an implied premise that would have been more contentious than any of his clear statements is to strain credulity to

<sup>3</sup> 'Traditional' refers to that reading of this passage which views Paul as addressing legalistic impulses within Judaism driven by an anthropological optimism whereby humans are thought to be able to earn salvation before God on the basis of their good works. Paul's argument, on such a view, articulates an intense anthropological skepticism, so that he is claiming in Gal 3.10 that anyone who attempts to earn salvation before God on the basis of doing good works is doomed to failure, since all such efforts inevitably fall short of the Law's perfect demand because of human sinfulness. For recent reassertions of this view, see A. Andrew Das, *Paul, the Law, and the Covenant* (Peabody, MA: Hendrickson, 2001) 145–70; idem, *Paul and the Jews*, 36–42; Westerholm, *Perspectives Old and New on Paul*, 375. Cf. also Mark A. Seifrid, *Christ, Our Righteousness* (NSBT; Downers Grove, IL: InterVarsity, 2000) 101–3; Moisés Silva, 'Faith Versus Works of Law in Galatians', *Justification and Variegated Nomism: Volume 2: The Paradoxes of Paul* (ed. D. A. Carson, P. T. O'Brien, and M. A. Seifrid; WUNT 2/181; Tübingen: Mohr Siebeck, 2004) 217–48, esp. 217–26; Simon Légasse, *L'Épître de Paul aux Galates* (LDC 9; Paris: Cerf, 2000) 228; Seyoon Kim, *Paul and the New Perspective: Second Thoughts on the Origin of Paul's Gospel* (Grand Rapids: Eerdmans, 2002) 128–64.

<sup>4</sup> N. T. Wright, 'The Letter to the Galatians: Exegesis and Theology', *Between Two Horizons: Spanning New Testament Studies and Systematic Theology* (ed. J. B. Green and M. Turner; Grand Rapids: Eerdmans, 2000) 205–36, 210.

<sup>5</sup> Luther, of course, recognized as much: 'Now these two sentences of Paul and Moses seem clean contrary' (Martin Luther, *A Commentary on Saint Paul's Epistle to the Galatians* [repr., Grand Rapids: Baker, 1979] 246).

<sup>6</sup> Das, *Paul, the Law, and the Covenant*, 145–46; Westerholm, *Perspectives Old and New on Paul*, 375; Seifrid, *Christ, Our Righteousness*, 102; Légasse, *L'Épître de Paul aux Galates*, 228; Pierre Bonnard, *L'Épître de Saint Paul aux Galates* (CNT 9; Genève: Labor et Fides, 1972) 67; Kim, *Paul and the New Perspective*, 141; Thomas R. Schreiner, *The Law and Its Fulfillment: A Pauline Theology of Law* (Grand Rapids: Baker, 1993) 44–5.

<sup>7</sup> Norman H. Young, 'Who's Cursed – and Why? (Galatians 3.10–14)', *JBL* 117 (1998) 79–92, 82–3; Wright, *The Climax of the Covenant*, 140, 147; Michael Cranford, 'The Possibility of Perfect Obedience: Paul and an Implied Premise in Galatians 3.10 and 5.3', *NovT* 36 (1994) 242–58, 244–5, 248; James M. Scott, ' "For as Many as are of Works of the Law are Under a Curse" (Galatians 3.10) ' *Paul and the Scriptures of Israel* (ed. C. A. Evans and J. A. Sanders; Sheffield: JSOT, 1993) 187–221, 189; Richard B. Hays, 'Galatians', *The New Interpreter's Bible*, vol. 11 (ed. L. E. Keck et al; Nashville: Abingdon, 2000) 181–348, 257.

<sup>8</sup> Das, *Paul, the Law, and the Covenant*, 154.

breaking point. Proponents of the traditional interpretation fail to appreciate how extremely unlikely this reading actually is.<sup>9</sup>

Such difficulties also prove fatal for several other proposed readings, since they each introduce complicating factors into the relationship between Paul's assertion in 3.10a and his citation of Deut 27.26 in 3.10b.<sup>10</sup> It is far more likely that Paul, in the midst of dictating this highly charged polemical letter, deployed Scriptural arguments that directly supported his assertions.

It will be argued that Paul's logic emerges clearly into view when his assertion in 3.10a is understood to be substantiated directly by his quotation from Deut 27.26 in 3.10b. Paul chose Deut 27.26, and not any other text, and we must assume that he did so for what that text brings to bear on the discussion. Since all we have are Paul's words, we ought to seek to understand him from the words he uses rather than setting his statements against each other thinking that the key to his meaning lies in some anachronistic theological formulation. I am not claiming that it is *impossible* that Paul could quote an OT text *against its original sense*, or *with some other sense*, but that it is extremely unlikely that he did so, and that we

9 The weakness of this interpretation is evident in the poor argumentation of its recent proponents. Das essentially argues that if other interpretive proposals can be shown to have problems, then the traditional reading must be affirmed (*Paul, the Law, and the Covenant*, 147). Kim states this questionable logic explicitly: 'Since all the attempts so far proposed to interpret [Gal 3.10] without the implied premise have failed, while the traditional interpretation with the implied premise makes perfect sense, we have to accept it as the right exegesis of our passage' (*Paul and the New Perspective*, 143). Westerholm, likewise, does not argue for this reading, but claims that it is so clear that any 'sympathetic reader' of the letter would come to such a conclusion (*Perspectives Old and New on Paul*, 375), leaving one to wonder to what extent Paul assumed the presence of such readers in Galatia while penning this letter.

10 According to the 'exile/restoration' interpretation, Paul argues that those who submit to Torah observance are taking on Israel's national way of life, which has led them into exile. All who embrace 'works of the law', therefore, fall inevitably under the curse of exile, which is Paul's point in Gal 3.10. Paul goes on to argue, on this reading, that Israel finds restoration from exile, along with the nations, in Christ. On this view, in v. 10 Paul quotes from more than simply Deut 27.26. He combines this passage with Deut 29.19b or 28.58 which demonstrates that he is not merely considering 27.26, but the whole of Deut 27.32 as a unit (Scott, 'For as Many as are of Works of the Law are Under a Curse' [Galatians 3.10]', 213; Wright, *The Climax of the Covenant*, 141–47; Hays, 'Galatians', 258; Joel Willitts, 'Context Matters: Paul's Use of Leviticus 18.5 in Galatians 3.12', *TynBul* 54 [2003] 105–22). This reading fails to convince, however, since there is nothing in the context of Galatians that points toward an exile/restoration dynamic. Further, and more to our point, the text that Paul clearly quotes, Deut 27.26, has to do with a curse on individuals who commit heinous sins, such that they are to be cut off from Israel. If Paul had a national curse in mind, there are other texts that he could have quoted more strategically. See also the recent proposal of J. Wisdom (*Blessing for the Nations and the Curse of the Law: Paul's Citation of Genesis and Deuteronomy in Gal 3.8–10* [WUNT 2/133; Tübingen: Mohr Siebeck, 2001]), who attempts to connect the curse with the failure to carry out the Abrahamic blessing on the nations. The specific curse that Paul utilizes, however, has to do with failing to uphold the Mosaic Law.

should only entertain such a notion if his logic makes no sense on a straightforward reading. Rather than assuming that Paul's assertion (v. 10a) and citation (v. 10b) are insufficient to elicit Paul's logic, it will be demonstrated that the hermeneutical key to unlocking his meaning is to allow his citation of Deut 27.26 to inform his assertion in Gal 3.10a.

Several considerations strengthen this point. First, Paul quotes Deut 27.26 without further comment, indicating that the reason he utilizes this text is for its probable meaning in its original narrative setting. Because he makes no interpretive statements, it is apparent that he expected his statement in 3.10a to be interpreted directly by his citation in 3.10b. Again, it is not impossible that Paul is employing irony, but in the absence of any indication that such is the case, we must not assume that this is his intent. Second, Paul's own conviction is that his gospel is upheld by – and upholds – the Law (cf. Rom 3.31). If this is so, then our assumption ought to be that he is supporting his case with the Scripture texts he cites understood within their original narrative contexts. If his argument can be made to make sense with this text being read according to its probable meaning in its original narrative setting, then there is no reason to attempt to construe Paul as citing it in any other way, especially as quoting it *against* its meaning in its original context.<sup>11</sup>

A second methodological consideration that drives our proposed interpretation has been hinted at above, which is that Paul's argument in Gal 3.10 should be informed by the logic that he develops throughout the letter. That is, Paul's argument is built upon his setting the gospel and the Law of Moses against each other as mutually exclusive confessions. The Law is an exclusive covenant with circumscribed boundaries, reinforced by the threat of a curse on 'transgressors' – those who failed to 'remain within' its circumscribed boundaries. The gospel, on the other hand, makes similarly exclusive claims, but the nature of its exclusivity is in its universality – to be faithful to the gospel of Christ is to affirm that the distinctions endorsed by the Law of Moses have no bearing on membership in the people of God.<sup>12</sup>

11 I am not here proposing a programmatic methodology but simply attempting to trace Paul's logic in this passage. If a satisfying account of Paul's argument emerges from a simpler, more straightforward reading of his assertion and citation without raising new problems in the text, then such a reading ought to be preferred over more torturous accounts. I recognize that our understanding of how NT writers quote Scripture must be determined on a case-by-case basis. Cf. Timothy G. Gombis, 'Cosmic Lordship and Divine Gift-Giving: Psalm 68 in Ephesians 4.8', *NovT* 47 (2005) 367–80.

12 On the exclusive nature of the gospel vis-à-vis any other strategy for claiming a place among the people of God, see B. R. Gaventa, 'The Singularity of the Gospel: A Reading of Galatians', *Pauline Theology, Volume 1: Thessalonians, Philippians, Galatians, Philemon* (ed. J. M. Bassler; Minneapolis: Fortress, 1991) 147–59.

The methodological points that drive this project are derived from the fundamental axiom known as Ockham's Razor. According to this principle, with all things being equal, the simplest explanation ought to be preferred. When a proposal results in the multiplying of difficulties, this is a sure sign that something is amiss. Both the 'traditional' and 'exile/restoration' readings rely on imported theological reasoning to account for Paul's logic and have thereby caused other interpretive problems. My proposal is an attempt to read Paul and his letter according to the words he uses and the logic that he develops, most explicitly stated within the passage regarded by scholars as the theological and rhetorical 'core' of the letter – 2.15–21.<sup>13</sup>

## 2. Sinners, Rebuilders, and Transgressors

In Gal 2.15–21, Paul draws out the full implications of the death and resurrection of Christ for Jews like himself.<sup>14</sup> He does so in order to demonstrate to his readers – as he did to Peter and the Jerusalem leaders – that it is not only no longer necessary to submit to the Law of Moses, but that it is impossible, now that Christ has risen from the dead and the gospel has gone to the nations. A *particular* gospel ('within Israel') is completely at odds with a *universal* gospel ('among the nations'). Working from agreed-upon assumptions, Paul demonstrates how it is that the logic of the gospel leads to new creation existence, in which there is no longer a distinction between 'Jew and gentile' – an existence completely at odds with being 'under Law'.<sup>15</sup>

### a. Galatians 2.11–14

According to Paul, the teachers in Galatia are propounding the same error as Peter in Antioch – that of the necessity of not only believing in Christ Jesus, but submitting to Law. Paul recounts that situation in 2.11–14 in order to expose the error into which the agitators are leading his Galatian converts.<sup>16</sup> He claims that when Peter first arrived in Antioch, he affirmed that, as a result of the death and resurrection of Christ, 'new creation' had arrived with the giving of the Spirit, and the followers of Jesus had been initiated into a new humanity in which there was no distinction between Jew and gentile. Because believers are no longer 'under

13 Hays, 'Galatians', 236; Hans D. Betz, *Galatians: A Commentary on Paul's Letter to the Churches in Galatia* (Hermeneia; Philadelphia: Fortress, 1979) 114; R. Longenecker, *Galatians* (WBC 41; Dallas: Word, 1990) 80–1; James D. G. Dunn, *The Epistle to the Galatians* (BNTC; Peabody, MA: Hendrickson, 1993) 132.

14 Heinrich Schlier, *Der Brief an die Galater* (Göttingen: Vandenhoeck & Ruprecht, 1965) 88. F. Mußner, *Der Galaterbrief* (HTKNT 10/2; Freiburg: Herder, 1988) 167.

15 Hays, 'Galatians', 236.

16 Schlier, *Der Brief an die Galater*, 82.

Law' (3.25; 4.21; 5.18), 'neither circumcision nor uncircumcision is anything, but new creation', and what matters is 'faith working itself out in love' (5.6; 6.15).

When some Jews arrived from the church in Jerusalem (2.12), however, Peter was intimidated and thrown into confusion regarding 'the truth of the gospel' (2.14). His cessation from engaging in table fellowship with gentile Christians implied that he affirmed the necessity of circumcision and submission to the authority of the Law of Moses. Paul confronted Peter's hypocrisy, rebuking him for not 'walking in accordance with the truth of the gospel', and exposing his inconsistency: 'if you, being a Jew, live as a gentile, and not as a Jew, how is it that you compel the gentiles to *live as Jews* (λουδαϊζειν, lit., 'to Judaize')?' (2.14). By fellowshipping with gentile Christians, Peter had affirmed that the gospel now had gone 'to the nations', but with his withdrawal, he was affirming a contradictory conviction – that gentiles must 'live as Jews' in order to enjoy God's salvation.

### b. Galatians 2.15–17

Paul then takes Peter, and Jewish Christians like him, back to basic gospel principles and fully develops their implications, demonstrating that Jewish identity does not constitute membership in the people of God, and is useless – as it always was – for justification before God. Working from agreed-upon assumptions, Paul states that even though he and Peter are 'Jews by nature' and not 'sinners from among the gentiles', they still must join with gentiles in believing in Christ for justification, since the ground of justification is not 'from works of law' (ἐξ ἔργων νόμου), but ἐκ πίστεως Χριστοῦ ('from the faithfulness of Christ/faith in Christ').<sup>17</sup> One's Jewish identity does not give one any priority before God for justification (ὅτι ἐξ ἔργων νόμου οὐ δικαιωθήσεται πᾶσα σὰρξ). Thus far, Jewish Christians like Peter would have agreed with Paul, though they doubtless would have felt uncomfortable with where the maverick apostle was leading them. Paul continues, however, to press his case.

In v. 17, he asks, if it is so that, 'while seeking to be justified in Christ, we ourselves have also been found sinners, is Christ then a minister of sin?' Paul is forcing his fellow Jews to recognize the implications of their need of seeking justification before God on the same basis as gentiles. He is playing on the Jewish prejudice with regard to gentile 'sinners'. Jews must locate themselves alongside gentiles in seeking justification, and are therefore forced to fellowship along with these 'sinners' in the newly constituted people of God.<sup>18</sup> Paul then presses the question: If finding salvation in Christ involves their fellowshipping with sinners,

17 Hans-Joachim Eckstein, *Verheißung und Gesetz: Eine exegetische Untersuchung zu Galater 2,15–4,7* (WUNT 86; Tübingen: Mohr Siebeck, 1996) 31.

18 Kjell Arne Morland, *The Rhetoric of Curse in Galatians: Paul Confronts Another Gospel* (Atlanta: Scholars, 1995) 188; Schlier, *Der Brief an die Galater*, 95.

is Christ, in so leading them, a minister of sin? The conclusion, of course, is absurd – the answer is equally obvious, μὴ γένοιτο (2.17).

It was this precise concern, however, that provided the cause of stumbling for Jews like Peter and the men from Jerusalem, since their consciences were informed by centuries of living under the authority of the Law of Moses. It had become an accepted notion that salvation could only be provided within the Mosaic Law – among the people of God, Israel. Could they fellowship with gentile Christians, or did such fellowship make them sinners? Paul answers that it is Christ Jesus himself who is leading them into fellowship with gentiles in the newly constituted people of God, and Christ is no minister of sin.

### c. Galatians 2.18–21

Paul continues to press the logic of the gospel in vv. 18–21 with two crucial arguments set off by the two appearances of γάρ in vv. 18 and 19. First, he states that, 'If I rebuild what I have once destroyed, I prove myself to be a transgressor'. The difficulty here is that there is no genitive phrase explaining what it is that Paul transgresses. It is fairly clear that when he speaks of rebuilding, Paul is referring to a reaffirmation of the Law of Moses and the distinction between Jew and gentile, but how does this demonstrate that he is a 'transgressor'? J. Lambrecht argues that the transgression in view is not against the Law, but against 'the new command to live for God' (2.19).<sup>19</sup> He claims that he would 'prove himself to be a transgressor' if he built up again the Law, making obedience to the new command no longer possible, thereby nullifying the grace of God (v. 21a).<sup>20</sup>

Lambrecht's proposed reading is unconvincing, however, mainly because there is no basis for viewing God's new initiative in Christ as an implied command. Lambrecht seems to concede as much, claiming only to have opened up the possibility of such a reading.<sup>21</sup> It is more likely that Paul had in mind a transgression of the Law of Moses, as most commentators recognize and as Lambrecht admits, stating that 'normally speaking, παραβάτης is a violator of the Law'.<sup>22</sup> If the transgression to which Paul refers is not a transgression of the Law, then there is nothing in the text to determine of what this transgression might consist. Therefore, while it is not impossible that Paul has in mind some other commandment than the Law of Moses, in the absence of any indication that such is the case,

it is more likely that he has in view the Mosaic Law.<sup>23</sup> In some way, then, if Paul goes back and reaffirms the authority of the Law, he becomes a transgressor of it.<sup>24</sup>

Paul is claiming that if he lives as if the distinctions between Jew and gentile have been eliminated ('what I have once destroyed'), and that Jew and gentile have become united in one body through the death of Christ, but then goes back and reaffirms that the Mosaic Law is still binding ('if I rebuild') and that one must live as a faithful Jew, he becomes a transgressor. He would be affirming two mutually exclusive confessions, since he is, at the same time, living without reference to the Mosaic Law, *and* claiming that obedience to the Mosaic Law is necessary. He simultaneously is unfaithful to the Law of Moses *and* confesses that one *must* remain faithful to the Law – thus proving himself to be a transgressor of the covenant stipulations. Paul is stressing the schizophrenic logic of Jewish Christians who are flinching from the full implications of the Law-free gospel. Peter and his fellow Jewish Christians are concerned to avoid becoming sinners by fellowshipping with gentiles, *but in so doing*, they do something far worse – they become transgressors of the Law!

This, of course, raises the question for Jews of what to do with their Jewish heritage – their identity as those who are defined by the Law of Moses. Are they simply to reject the Law, the word of God delivered to Israel? Paul answers this question in his second elaboration beginning with γάρ in vv. 19–21. He states, quite cryptically,<sup>25</sup> that 'through the Law I died to the Law, so that I might live to God' (ἐγὼ γὰρ διὰ νόμου νόμῳ ἀπέθανον, ἵνα θεῷ ζήσω). In pointing ahead to his argument in Gal 3.10, 13, Paul claims that the circumscribing function of the Law, designed to keep Israel distinct from the nations is the very thing that, ironically, provided for his release from it. The Law may be pictured as a fortress, the walls of which did not allow for any to escape from its jurisdiction, and all who transgressed it bore the judgment of the God of Israel. It is this very confining and

19 J. Lambrecht, 'Transgressor by Nullifying God's Grace', *Bib* 72 (1991) 217–36, 235.

20 Lambrecht, 'Transgressor', 222.

21 'Of course, all these remarks do not directly prove that in Gal 2.18b Paul thought of a transgressor of God's new initiative in Christ and the command it implies, but at least they indicate for Paul the possibility of that idea' (Lambrecht, 'Transgressor', 236).

22 Lambrecht, 'Transgressor', 234.

23 Betz, *Galatians*, 120. As Dunn notes, transgression of the Law of Moses would have been self-evident, since this is the normal usage of the term throughout the NT (cf. Rom 2.25, 27; 4.15; Jas 2.9, 11) (*Galatians*, 142–3). Lambrecht concurs, conceding that the παραβάτης-παράβασις vocabulary in Paul strongly suggests the meaning transgressing the Law ('Transgressor', 217). We may note one further consideration against Lambrecht's case: it is highly unlikely that Paul is arguing that the opponents are transgressing God's new initiative in Christ, since they can simply deny such an assertion, claiming that it is in fact Paul who is working against the grace of God in Christ by proclaiming a Law-free gospel. This is, after all, a claim that Paul denies in v. 21 – that he is nullifying the grace of God. Rather than merely asserting a claim that has no basis, it is more likely that Paul is constructing an argument whereby he demonstrates that the teaching of the opponents is internally inconsistent and incoherent.

24 Dunn, *Galatians*, 142–3; Betz, *Galatians*, 121; cf. Longecker, *Galatians*, 91; J. L. Martyn, *Galatians: A New Translation with Introduction and Commentary* (AB 33a; New York: Doubleday, 1997) 256; Hays, 'Galatians', 242.

25 Hays calls this an 'opaque formulation' ('Galatians', 243).

circumscribing function of the Law (cf. Gal 3.23) that provided for Paul's (and his fellow Jewish Christians') release from the Law and his deliverance into the 'freedom of the Sons of God' (Gal 3.26; 4.6–7; 5.1).

How is this so? Paul explains this puzzling claim in vv. 20–21. The way he is delivered from bondage 'under Law' (3.25; 5.18) – a condition he equates with being a 'slave' (4.7), and being captive 'to this present evil age' (1.4) – and from the circumscribing boundaries of the Law is by his participation in the death and resurrection of Christ. Because Paul has died with Christ (v. 20), he is no longer under the authority of the Law, no longer bound to 'remain within' its circumscribing boundaries, and he is now free to participate fully in the life of Christ, which is to abide with the people of God, constituted by all those who believe in Christ, regardless of whether they are Jew or gentile, male or female – all are one in Christ (3.28). So, it is through the Law's requirement of the death of a person who transgressed the Law that Paul is set free from the Law. By his participation in the death of Christ, therefore, Paul dies to the Law; and through his participation in the resurrection of Christ, Paul may now 'live to God'.

Paul is claiming, over against his opponents, that in the death and resurrection of Christ the grace of God has broken through the boundaries of the Law of Moses, so that it is now 'among the nations', and those who maintain that the boundaries of the Mosaic Law are still in force – that the walls separating Jew and gentile must be 'rebuilt' – are confused. They are transgressors, in that they affirm two mutually exclusive convictions – that neither circumcision nor uncircumcision is anything (5.6; 6.15), *and* that the distinction between circumcision and uncircumcision means *everything*. With this framework in place, we are now prepared to understand Paul's logic in Gal 3.10.

### 3. The Curse of the Law

Paul states in Gal 3.10 that 'as many as are of the works of the law are under a curse' (ὅσοι γὰρ ἐξ ἔργων νόμου εἰσὶν, ὑπὸ κατάραν εἰσὶν). The group designated by ὅσοι ἐξ ἔργων νόμου εἰσὶν is those who hold to the doctrine of the Judaizers – the teaching that one must believe in Christ Jesus for salvation *and* submit to the Mosaic Law.<sup>26</sup> The phrase ἔργα νόμου simply denotes obedience to the Mosaic Law, or living as a faithful Jew.<sup>27</sup> It is unlikely that Paul is referring to

26 Wisdom, *Blessing for the Nations and the Curse of the Law*, 160.

27 The phrase ἔργα νόμου appears in Gal 2.16 (3x); 3.2, 4, 10. That it has reference to Jewish identity is clear from the use of the phrase alongside Peter's and Paul's Jewish identity viz. gentile 'sinners' in 2.14–17 (Joseph B. Tyson, "'Works of Law' in Galatians", *JBL* 92 [1973] 423–31, 425; Young, 'Who's Cursed – and Why? [Galatians 3.10–14]', 80; James D. G. Dunn, 'Yet Once More – "The Works of the Law": A Response', *JSNT* 46 [1992] 99–117, 102; Normand Bonneau, 'The Logic of Paul's Argument on the Curse of the Law in Galatians 3.10–14', *NovT* 39 [1997] 60–80, 67).

all Jews, since he does not consider himself and fellow Jews like Peter as being under a curse.<sup>28</sup> Nor does this phrase have reference to legalism or legalistic strivings, so that the group in view here is all those who attempt to achieve salvation by their meritorious works.<sup>29</sup> He is referring very specifically to the group in Galatia that he views as affirming two mutually exclusive convictions, along with anyone who accepts their teaching.

This group in Galatia is set in contrast to οἱ ἐκ πίστεως in v. 9, who are blessed along with Abraham for their response of πίστις to the revelation of God in Christ.<sup>30</sup> Paul here sets these groups in opposition to each other as representing two eschatologically oriented present identities – ἔργα νόμου, Paul's rhetorical shorthand for Jewish identity, and πίστις, the faithfully obedient response to the revelation of God in Christ, actualized by fellowship with all followers of Jesus regardless of ethnic identity. That is, the conflict in Galatia is over which present mode of existence is that which God will vindicate, or justify, at the eschatological judgment. Will he vindicate those who are ἐξ ἔργων νόμου, or those who are ἐκ πίστεως?<sup>31</sup>

Why does Paul claim that this former group is accursed? To answer this question we must understand Deut 27.26. In Deut 27.15–26, twelve curses upon certain sins are listed. These are sins committed in secret, demonstrating a heart of treachery. Because of their secrecy, the perpetrator could escape detection and punishment by human courts. If such sins were left unpunished, the penalty would fall upon the nation as a whole. In this ceremony of blessing and cursing, the people shout their 'amen' as the curses are listed, agreeing that the person who commits such sins ought to bear the judgment, sparing the people.<sup>32</sup>

The curse in Deut 27.26 comes upon the one who 'does not confirm (קִּיְיָ־אֱלֹהֵי) the words of this law by doing them'. It is a summary statement having to do with

28 Cf. also Morland, *The Rhetoric of Curse in Galatians*, 209.

29 Contra Thomas R. Schreiner, 'Works of the Law', *Dictionary of Paul and His Letters* (ed. G. F. Hawthorne, R. P. Martin, and D. G. Reid; Downers Grove, IL: InterVarsity, 1993) 975–8, 978; Douglas Moo, "'Law', 'Works of the Law', and Legalism in Paul", *WTJ* 45 (1983) 73–100, 75.

30 J. Becker, *Der Brief an die Galater* (Göttingen: Vandenhoeck & Ruprecht, 1998) 50.

31 According to Wakefield, Galatians 3 has only to do with life here and now, so that Paul is addressing the question of 'where to live', to the exclusion of soteriological concerns (Wakefield, *Where to Live*, 170). Paul, however, makes no distinction between the hope of eschatological vindication and present identity, claiming, on the other hand, that they are integrally linked. The very issue that has given rise to this letter is an actual 'on the ground' pastoral problem, which Paul relates directly to eschatological vindication.

32 P. C. Craigie, *The Book of Deuteronomy* (NICOT; Grand Rapids: Eerdmans, 1976) 331; G. Von Rad, *Deuteronomy: A Commentary* (OTL; Philadelphia: Westminster, 1966) 168–9; R. D. Nelson, *Deuteronomy: A Commentary* (OTL; Louisville: Westminster John Knox, 2002) 319–20; cf. also E. Bellefontaine, 'The Curses of Deuteronomy 27: Their Relationship to the Prohibitives', *A Song of Power and the Power of Song: Essays on the Book of Deuteronomy* (ed. D. L. Christensen; Winona Lake, IN: Eisenbrauns, 1993) 256–68.

a curse on gross disobedience and rejection of the Law. The person who did not 'confirm the words of this law' was one who was a covenant breaker, demonstrating fundamental covenant unfaithfulness. As such, he is worthy of being accursed, cut off from the covenant people of God.

According to the 'traditional' interpretation of Gal 3.10, Paul 'radicalizes' Deut 27.26, turning it into a curse on all who do not fulfill the Law's demand for perfect obedience.<sup>33</sup> Others who espouse an exile/restoration reading of this text claim that Paul is picking up on the larger narrative movement of Deut 27–30, the main theme of which is Israel's exile and restoration.<sup>34</sup> Nothing in the text, however, points in either of these directions.

What is unique about our proposal is that it is an attempt to interpret Paul's assertion from the meaning of Deut 27.26 in its original narrative setting, not from some vague Pauline theological reasoning that is supposedly found elsewhere in his letters. His assertion in v. 10a that the group in view is accursed must be interpreted by the text from Deuteronomy and within his broader sustained argument, since these are the only textual factors that give clues to Paul's meaning. His claim is that those who hold to the Judaizing doctrine are accursed because they are failing to 'remain within' the Mosaic Law by their affirmation of the gospel. The reality of the gospel is that there is no longer a distinction between Jew and gentile – 'neither circumcision nor uncircumcision is anything'. For Jewish Christians, therefore, to believe the gospel and to advocate obedience to the Mosaic Law is to fail to remain within the things written in the Law – they have become transgressors of the Law, thus bearing the curse of the Law.

He is again exposing the incoherent position occupied by the teachers in Galatia. Deut 27.26 pronounces a curse on anyone who does not 'remain within' (ἔμμενει) the boundaries marked out by the Law. If a believer in Jesus Christ –

anyone who affirms the 'rule (τῷ κανόνι)' that 'neither circumcision nor uncircumcision is anything' (Gal 6.15–16) – affirms the authority of the Law of Moses, he immediately becomes a transgressor, since he finds himself failing 'to remain within' the Law. Similarly, those who hold to these two mutually exclusive 'rules of faith' (cf. Gal 6.16), bear the curse of the Law. This is a further argument in Paul's arsenal whereby he aims to demonstrate to Jews like Peter, his Galatian opponents, and his Galatian converts, that the Judaizing position is impossible and must be abandoned.

It is important to note that Paul is not here claiming that this is actually something that can be done. It is impossible to incur the curse of the Law, since Christ has already absorbed its curse in his death, evacuating its power to curse.<sup>35</sup> Those who participate in the death and resurrection of Christ are freed from the authority of the Law with regard to its circumscribing function. This is Paul's point in 2.19, to which he returns in 3.13. Christ redeemed Jews who believe in him from under the authority of the Law, by bearing the curse in his death, so that all who identify with him are freed from its circumscribing authority – its requirement to 'remain within' the boundaries marked out by its practices – and can receive, along with gentiles, the blessing of Abraham in Christ, and the promise of the Spirit by faith (3.14). The Spirit has been poured out now among the nations and all those in Christ are freed to participate with gentiles in the fulfillment of the Abrahamic promise.

Paul's strategy, therefore, is rhetorically dissuasive. He is demonstrating the predicament in which the Judaizing teaching leaves its adherents. It is impossible to maintain. To embrace justification ἐκ πίστεως Χριστοῦ is to recognize that one is justified apart from one's Jewish identity or observance of the Law. To then confess that one must observe the Law while at the same time confessing that it has no authority is a blatant contradiction and an impossibility.

#### 4. Conclusion

The strength of the reading proposed here is its simplicity. It does not involve any torturous account of the relationship between Paul's assertion in Gal 3.10a and his citation of Deut 27.26 in 3.10b. Further, it coheres well with Paul's argument which he develops throughout his letter. Any proposed reading must be judged by how well it accounts for all the data in the text and whether or not it answers the difficult questions without raising insurmountable new ones. I have argued that, rather than relying on implicit premises that would have been highly contentious, Paul's assertion is to be interpreted within the argument of Galatians and in light of his use of Deut 27.26 in continuity with its meaning in its original context.

33 Das, *Paul, the Law, and the Covenant*, 154–55; Herman Ridderbos, *Paul: An Outline of His Theology* (Grand Rapids: Eerdmans, 1975) 136. Seifrid claims that Paul adds the word 'all' to his quotation of Deut 27.26, and that his use of the expression 'to remain' makes this a 'strict interpretation of the demand of the law' (*Christ, Our Righteousness*, 102; cf. also Bonnard, *L'Épître de Saint Paul aux Galates*, 67; Légasse, *L'Épître de Paul aux Galates*, 228; Kim, *Paul and the New Perspective*, 141). It appears, however, that Paul quotes from the LXX, which includes πάσι and ἔμμενει. The addition of πάσι in the LXX captures well the sense of the reference to the entire Law, and ἔμμενει is a faithful rendering of the Hebrew term בּוֹיָה in that it stresses the necessity on the part of the Israelite who was under the authority of the Law to 'remain within' the entire body of instruction given through Moses. It rightly emphasizes the necessity of covenant faithfulness. The changes from the original text, then, have already been made in the LXX, making it unlikely that Paul changed the meaning of Deut 27.26 to refer to legalism. It is highly improbable that these changes can bear the theological weight so often placed on them.

34 Scott, "For as Many as are of Works of the Law are Under a Curse" (Galatians 3.10)', 213; Wright, *The Climax of the Covenant*, 140–1, 146; Hays, 'Galatians', 258.

35 Cf. Martyn, *Galatians*, 326.