

PAPER NO. 2
Kinnaird Appeal Rehearing

Tyson Responds to REASONS

Counsel Rev. Thomas E. Tyson Responds to the Report of the Trial Judicatory titled, “REASONS for verdict of 1/25/03.”

Does the Session, acting as Trial Judicatory, have adequate grounds for their decision?

The Session’s explanation of the reasons for its decision is faulty and totally inadequate as grounds for the conviction.

In support of this conclusion, the appellant’s counsel offers the following analysis of the Session’s document, “*REASONS for verdict of 1/25/03*,” submitted to Presbytery:

1. The Session quotes WLC # 77, and then says:

“...The judicatory concluded that there was error, as well as confusion, in the statements of Elder Kinnaird that inadequately differentiated justification and sanctification. Specifically, the judicatory noted that Elder Kinnaird’s words taught that:

- A) justification was not conclusive at conversion, and thus inadequate; and
- B) sanctification, by the believer’s law-keeping or good works or holiness (or some combination of these), finished the acceptance that God requires for entrance to heaven...”

Analysis:

a. We must inquire: *where are the words* by which the appellant allegedly “taught... [A) and B)]”? Such simply are not quoted, documented or identified. Could it be that they are not *there*? The fact is that such words or teaching are not to be found in the writings of the appellant. The Session asks the Church to take its word for it that the appellant teaches these admittedly egregious and manifestly heretical teachings without any proof whatsoever, and then to consider such to be a compelling reason for its finding the appellant guilty of heresy.

b. The problem created by this assertion, made without proof having been offered, has been a recurring one. Throughout the trial, the prosecution team was permitted to make false assertions while not under oath and subject to cross-examination. They did this without offering proof by way of quotation from Elder Kinnaird's writings, showing that he had actually said such-and-such things. Since they were not under oath and subject to cross-examination, the defense could not demand that they show proof of their assertions from the writings of Elder Kinnaird. The defense then is saddled with the task of proving the negative. The only way we can absolutely prove that such words, statements, and teachings are not present is to offer to the presbyters the complete documents upon which the case is based—therefore these documents are available from (email address deleted), or, if you cannot receive them by e-mail and desire to have them, call (phone number deleted).

c. But further, since when did “confusion” and “inadequate differentiation”

become chargeable offenses? Would anyone be free of offense if these were the bar?

2. The Session quotes the appellant:

“...Neither the imputation of the righteousness of Christ, which all Christians receive at justification...can suffice for that purpose [i.e., the ‘purpose’ is stated to be ‘fully conformed to the image of Christ in true and personal righteousness and holiness,’...]

Then the Session complains:

“this statement the judicatory found very troubling, as the statement on face value is denigrating the finished work of the Lord Jesus Christ on behalf of His people.”

Analysis:

a. The appellant is thus accused of denigrating the finished work of the Lord Jesus Christ on behalf of His people, presumably by saying that it cannot suffice for the purpose of making Christians fully conformed to the image of Christ in true and personal righteousness and holiness. The truth of the matter, however, is that he does no such thing. He most certainly does *not* say that the finished work of the Lord Jesus Christ on behalf of his people cannot suffice for that purpose. What he does say is that the *imputation* of such cannot suffice for that purpose—and that critical difference must not be missed. His teaching, rather, fully accords with that of WCF XIII:1:

“They, who are once effectually called, and regenerated, having a new heart, and a new spirit created in them, are further sanctified, *really and personally*, through the virtue of Christ’s death and resurrection, by his Word and Spirit dwelling in them: the dominion of the whole body of sin is destroyed, and the several lusts thereof are more and more weakened and mortified; and they more and more quickened and strengthened in all saving graces, to the practice of true holiness, without which no man shall see the Lord”.

As well, it fully accords with L. Cat, Q. 77:

“Wherein do justification and sanctification differ? A. Although sanctification be inseparably joined with justification, yet they differ, in that God in justification imputeth the righteousness of Christ; in sanctification his Spirit infuseth grace, and enableth to the exercise thereof; in the former, sin is pardoned; in the other, it is subdued: the one doth equally free all believers from the revenging wrath of God, and that perfectly in this life, that they never fall into condemnation; the other is neither equal in all, nor in this life perfect in any, but growing up to perfection.”

The appellant teaches that this sanctification, which with glorification leads to a real and personal righteousness wherein we are fully conformed to the image of Christ and while grounded in the finished work of Christ, does not take place by *imputation*, but by *infusion* (cf. L.Cat. # 77, “...God in justification imputeth the righteousness of Christ; in sanctification his Spirit infuseth grace...”).

b. We must ask a question at this point, one that goes right to the heart of the issue between Mr. Wilkening (the accuser), together with those helping him develop and prosecute the case, and Elder Kinnaid, the defendant: Is it an end result of the gift of salvation that we become actually righteous, delivered from our sinful nature and fully conformed to the image of Christ in righteousness and holiness? Or, do we not? Mr. Hayes, a member of the prosecution team, wrote to the Bethany Session on June 22, 2002

(which letter was forwarded to Presbytery on July 2, 2002 and became a matter before the Interim Session when they took over). In it he took issue with the literalness of the new man created after the image of God, as set forth in 1 John 3 (regeneration). He wrote “that the dominion of sin is not destroyed in sanctification.” Thus he denied the teaching of our Confession that “They, who are once effectually called, and regenerated...are further sanctified, really and personally...the dominion of the whole body of sin is destroyed...,” and claimed further that we remain sinners throughout eternity future, as opposed to LC Q&A 86 which declares that at death we are glorified and made perfect in righteousness. In this way he denied the end result of regeneration, sanctification, and glorification: the restoration of the Christian to possession of a real and personal righteousness, and the total destruction of original sin and its corruption. Elder Kinnaird, however, in conformity with Scripture and our creeds, teaches just that. The question we must ask is: “Does the Session agree with Mr. Hayes or with Mr. Kinnaird?”

c. Further, we must ask: Is it proper to convict someone of heresy because a judicatory finds a statement to be “very troubling, as the statement on face value” appeared to say this or that, when, had they read more objectively, they would have discovered that the statement was not troubling at all and did not teach that which they initially had thought, at face value, it might teach?

3. The Session says of the appellant’s words, “If we are to be conformed to his [Christ’s] image, we too must have a real and personal righteousness”:

“this statement gives the impression that Christ’s work and death are insufficient, since His work cannot ‘suffice’ to pay for His people’s salvation.”

Analysis: This is an outrageous assertion!

a. The appellant, once more, is condemned because he “gives the impression...” Not that he *says* something, but that he *gives some impression or other*. Such an accusation is unworthy of consideration by an OPC judicatory. The appellant is not responsible for impressions formed in the minds of some folks; he is responsible for what he tells them.

b. But, more importantly, he simply does not say anywhere in his writings that Christ’s work cannot “suffice” to pay for His people’s salvation. What he says, in submission to Scripture and our Standards, is that sanctification, while based on Christ’s work, is not accomplished by imputation but by an infusion of grace, as set forth in LC Q&A 77. It is the *imputation* of the work of Christ whereby we are justified. Elder Kinnaird says that it (the imputation) does not suffice to sanctify and glorify us. Christ’s work suffices for all of our salvation because it earned Christ the right to send the Holy Spirit to sanctify His Church.

4. The Session says:

“The judicatory considered it a great error in teaching that Christ’s work for our salvation does not ‘suffice’ in a particular area. To make the statement is then to countenance the law-abiding works of believers as making up, by their own efforts, what is lacking in Christ’s work for their salvation and thereby securing their own salvation.”

Analysis:

a. The first sentence of the above quotation has already been answered above.

But, to allege that the appellant teaches the admitted heresy contained in the *second* sentence defies comprehension. If the appellant teaches *that*, he ought to be *excommunicated*, not suspended from office! For, if he taught that, he would by that teaching deny the very gospel itself. But, thanks be to God, he doesn't teach it, and it escapes credulity to understand where the Session ever got the idea that he does.

b. One has only to read the writings of Elder Kinnaird to see that over and over again he teaches the very opposite of that which the Session says he countenances. He never "countenance[s] the law-abiding works of believers as making up, by their own efforts, what is lacking in Christ's work." He teaches *ever* the very opposite. Sadly, the Session declares white to mean black.

5. The Session says:

"Elder Kinnaird's 'real and personal righteousness' is presented as something additional in some way; and it is not clearly stated in *what* way. The righteousness that the believer depends on is *always* Christ's, whether imputed in Justification or imparted in Sanctification, and is always 'accounted' and 'accepted' *as if* it was our real and personal righteousness (cf. 2 Cor. 5:21, WLC, # 72). Elder Kinnaird's statements, [*sic*] are erroneous distortions of clear biblical teaching."

Analysis:

a. "...not clearly stated...": again, the appellant is condemned for lack of clarity, something that we do not take to be a chargeable offense

b. But more importantly, it seems to be *the Session* that suffers from confusion—*Christ's righteousness imparted in Sanctification?* Where is the documentation for that assertion, in either Scripture or our Standards? ? It is true that we may speak of a righteousness that comes from Christ, but it is not the transfer of His attribute to us. Rather, it is the creation of a righteous attribute in the soul of the believer by an infusion of grace. Christ works righteousness in us as actual conformity to his image..

c. Furthermore, the "grace infused" in Sanctification (L. Cat. # 77) results, according to the Session, in a righteousness that is not real and personal, but only "*as if*" it were real and personal? Wherever does the Session get *that* idea? It appears that it is the teaching of the *Session*, and not that of Elder Kinnaird, that needs to be examined for conformity to our Church's standards.

6. The Session quotes the appellant: "It is those who obey the law who will be declared righteous on that Day of Judgment." They say:

"Elder Kinnaird's statement appears to attribute the Christian's sanctification ('doing good' and 'perseverance') as the deciding factor [for entrance into everlasting life], thus gravely confusing justification and sanctification; AND to teach, effectively, a doctrine of justification by faith and works."

Analysis:

a. Once more the Session complains that the appellant *appears* to teach something or other, not that he *does* so teach

b. And, whatever he teaches, the Session says that it *gravely confuses* justification and sanctification. However, the accusation is actually leveled against the *Bible*, because the appellant, in the second statement of the first specification, quotes Rom. 2:13 (with the added venue, "on the Day of Judgment," plainly found in the context of vv. 5-16).

Appended at the end of this paper is an analysis of Romans 2:13, within its context of verses 5-16, which is commended for your reading.

c. The appellant simply does not say anywhere that sanctification is the deciding factor for entrance into everlasting life. Rather, he affirms, with WCF XXXIII, that at the Last Judgment all persons will “receive according to what they have done in the body, whether good or evil” and, with LC Q&A 88 and 90, that that judgement will be one unto condemnation or acquittal:

Q. 88. What shall immediately follow after the resurrection? A. Immediately after the resurrection shall follow the general and final judgment of angels and men; the day and hour whereof no man knoweth, that all may watch and pray, and be ever ready for the coming of the Lord.

Q. 90. What shall be done to the righteous at the day of judgment? A. At the day of judgment, the righteous, being caught up to Christ in the clouds, shall be set on his right hand, and there openly acknowledged and acquitted...

See also WSC # 38

d. The appellant exegetes Rom. 2:13 as setting forth an actual, not a theoretical, hypothetical, figurative, or non-existent, acquittal at the Day of Judgment. Will all those who embrace the same exegesis likewise suffer the same condemnation? The theology of OPC officers is not to be scrutinized as to its conformity to the exegeses of even a majority of scholars. What it *must* conform to is the theology set forth in the Standards (cf. the analysis of Rom. 2:13 found at the end of this paper”).

e. Further, if it disagrees with this understanding of Romans 2:13, what does the Session do with other passages, such as the following (or does the Session agree with the testimony of the accuser, Mr. Wilkening, given before the court on November 23, 2002, that there will be no Christians present at the last judgement, a viewpoint that is patently contrary to our Creeds and Scripture?):

“But after thy hardness and impenitent heart treasures up unto thyself wrath against the day of wrath and revelation of the righteous judgment of God; Who will render to every man according to his deeds,” Romans 2:5-6.

“Wherefore we labor, that, whether present or absent, we may be accepted of him. For we must all appear before the judgment seat of Christ; that every one may receive the things done in his body, according to that he hath done, whether it be good or bad,” 2 Cor. 5:9-10.

“But why dost thou judge thy brother? or why dost thou set at nought thy brother? for we shall all stand before the judgment seat of Christ. For it is written, As I live, saith the Lord, every knee shall bow to me, and every tongue shall confess to God. So then every one of us shall give account of himself to God” Rom. 14:10-12.

“But I say unto you, That every idle word that men shall speak, they shall give account thereof in the day of judgment. For by thy words thou shalt be justified, and by thy words thou shalt be condemned,” Matt. 12:36-37.

“When the Son of man shall come in his glory, and all the holy angels with him, then shall he sit upon the throne of his glory: And before him shall be gathered all nations: and he shall separate them one from another, as a shepherd divideth his sheep from the goats: And he shall set the sheep on his right hand, but the goats on the left. Then shall the King say unto them on his right hand, Come, ye blessed of my Father, inherit the kingdom prepared for you from the foundation of the world: For I was an hungred, and

ye gave me meat: I was thirsty, and ye gave me drink: I was a stranger, and ye took me in: Naked, and ye clothed me: I was sick, and ye visited me: I was in prison, and ye came unto me. Then shall the righteous answer him, saying, Lord, when saw we thee an hungered, and fed thee? or thirsty, and gave thee drink? When saw we thee a stranger, and took thee in? or naked, and clothed thee? Or when saw we thee sick, or in prison, and came unto thee? And the King shall answer and say unto them, Verily I say unto you, Inasmuch as ye have done it unto one of the least of these my brethren, ye have done it unto me. Then shall he say also unto them on the left hand, Depart from me, ye cursed, into everlasting fire, prepared for the devil and his angels: For I was an hungered, and ye gave me no meat: I was thirsty, and ye gave me no drink: I was a stranger, and ye took me not in: naked, and ye clothed me not: sick, and in prison, and ye visited me not. Then shall they also answer him, saying, Lord, when saw we thee an hungered, or athirst, or a stranger, or naked, or sick, or in prison, and did not minister unto thee? Then shall he answer them, saying, Verily I say unto you, Inasmuch as ye did it not to one of the least of these, ye did it not to me. And these shall go away into everlasting punishment: but the righteous into life eternal,” Matt. 25:31-46.

Would the Session say that these passages of Scripture “appear to attribute the Christian’s sanctification (‘doing good’ and ‘perseverance’) as the deciding factor [for entrance into everlasting life], thus gravely confusing justification and sanctification; AND to teach, effectively, a doctrine of justification of faith and works?”

7. The Session writes:

“Colossians 1:12-14 speaks of how the Father ‘has qualified’ believers to share in a heavenly inheritance. How? Through the Son, in whom we have redemption, the forgiveness of sins. Our ‘qualification’ is by the Son’s redemptive-forgiving work on the Cross (cf. vv. 20-22), not the sanctifying work of the Spirit. To use John Murray’s words, it is the ‘redemption accomplished’ part of our salvation through Christ which *qualifies us* for Judgment Day – NOT the ‘redemption applied’ part of our salvation through the Holy Spirit. [note chapter 3, ‘The Perfection of the Atonement,’ in his *Redemption Accomplished and Applied*]”

Analysis:

a. We raise the question whether these remarks *of the Session* are in conformity with the Scriptures and our Standards! The Session is saying that we are *qualified for Judgment Day* by “the Son’s redemptive-forgiving work on the Cross,” (“redemption accomplished”) and *not* by the “sanctifying work of the Spirit (“redemption applied”). How can such be the case? That construction means that not even *faith*, in fact, not even *justification* by faith (!), is required, let alone works! No application of redemption at all—just its accomplishment? We suggest that if the appellant needs instruction, he will not be helped by this explanation.

b. Indeed, the Session, by looking only at verses 12-14 in Colossians 1, misses the point put forth so well in verses 10-14:

“And we pray this in order that you may live a life worthy of the Lord and may please him in every way: bearing fruit in every good work, growing in the knowledge of God, being strengthened with all power according to his glorious might so that you may have great endurance and patience, and joyfully giving thanks to the Father, who has qualified

you to share in the inheritance of the saints in the kingdom of light. For he has rescued us from the dominion of darkness and brought us into the kingdom of the Son he loves, in whom we have redemption, the forgiveness of sins.”

Indeed, we are qualified by regeneration, adoption, justification, sanctification, glorification, and all other saving graces by virtue of the covenant of grace, based wholly on the meritorious life and death of Jesus Christ and His resurrection. Furthermore, the Session rightly points us to verses 20-22, but in doing so misses the purpose of the redemption that is in Christ, namely that we might be qualified by becoming holy and blameless.

“But now he has reconciled you by Christ's physical body through death to present you holy in his sight, without blemish and free from accusation” (Col. 1:22).

In passing, we mention that we find nothing in Murray’s chapter 3, “The Perfection of the Atonement,” to support this strange view proclaimed by the Session.

8. The Session quotes the appellant:

“thus we rightly conclude that those inside the city are those who have kept the law of God and those only,” (referring to Revelation 19:8) and “...the decision...made on that great day of judgement [is] in accordance with what you have done in this life.” (referring to Romans 2:6-8 and Revelation 22:12.”

Then the Session goes on to remark:

“These statements are contrary to the statements made in WCF 8,5, which speaks “Of Christ the Mediator...[and Heb. 10:4]...Yes, Elder Kinnaird’s sermon later says salvation is found in no one else than Christ (here he quotes Acts 4:12, and Romans 10:9, 11, 13). However, the statements in question appear wholly gratuitous and without a needed Scriptural balance...”

Analysis:

a. The appellant affirms the sole Mediatorship of Christ, but his affirmation is termed “wholly gratuitous.” Outrageous! To discover whether or not it is proper to call Elder Kinnaird’s affirmation “wholly gratuitous,” all one need do is read the paragraph from his sermon, reproduced below, beginning with: “So, if you would come....” The appellant teaches the truth of all the passages of Scripture cited by the Session *and* of WCF VIII:5, and still the Session dares to say that “his teaching is without a needed Scriptural balance.” So, was *every* sermon that has ever been preached perfectly balanced? Furthermore, even if it *were* true that the appellant has evidenced gratuitousness and lack of balance—which we do not grant—does *that* equate to teaching a doctrine of justification by faith and works?

b. Webster defines a gratuitous affirmation as one “not required, called for, or warranted by the circumstances; made or done without sufficient cause or reason.” We judge that proclaiming the sole mediatorship of Christ Jesus to sinners, in an invitation to come to Christ and to partake of the righteousness that He has promised to those who come to Him, is *anything but gratuitous*. Again, we think it would be helpful if the members of the Presbytery would read for themselves the sermon in question in order to see just how grotesque is this representation by the Session that Elder Kinnaird’s statement is gratuitous. (Incidentally, he cites Acts 2:21, in addition to the passages listed by the Session, but he does *not* cite Romans 10:13, though well he could have).

c. We recognize that often the evidence in a case is not made available to the

members of the appellant judicatory. Yet we judge it so important that each member read the relevant portion of this sermon, that we reproduce it here. Having discussed Jeremiah 31:33-34, Elder Kinnaird then preaches:

“A companion passage, Ezekiel 36:25-28 records, ‘I will sprinkle clean water on you, and you will be clean; I will cleanse you from all your impurities and from all your idols. I will give you a new heart and put a new spirit in you; I will remove from you your heart of stone and give you a heart of flesh. And I will put my Spirit in you and move you to follow my decrees and be careful to keep my laws. You will live in the land I gave your forefathers; you will be my people, and I will be your God.’

Both of these passages are speaking of the gift of the Holy Spirit and of the change in the human heart that occurs in this life. Mark that I said, “In this life”. This is not something that is put off until some future golden age when you may no longer be alive. Neither is it something put off until eternity. These passages speak of God’s law being written in your heart now in this day. And they speak of the resulting walk before the Lord in righteousness of God’s people – all those who inherit the eternal City of God. Even as Peter told his audience that they could receive the promise right then and there on the Day of Pentecost, so I tell you that you can partake of the promised righteousness here; now.

So, if you would come and drink of that life-giving stream, I will give you this instruction, all in the words of Scripture: ‘Salvation is found in no one else, for there is no other name under heaven given to men by which we must be saved’ (Acts 4:12); ‘And everyone who calls on the name of the Lord will be saved’ (Acts 2:21); ‘That if you confess with your mouth, ‘Jesus is Lord,’ and believe in your heart that God raised him from the dead, you will be saved. For it is with your heart that you believe and are justified, and it is with your mouth that you confess and are saved. As the Scripture says, Anyone who trusts in him will never be put to shame’ (Romans 10:9-11).

And if you have made that profession, then I would comfort you with these words from the first ten verses of Ephesians chapter 2: ‘As for you, you were dead in your transgressions and sins, in which you used to live when you followed the ways of this world and of the ruler of the kingdom of the air, the spirit who is now at work in those who are disobedient. All of us also lived among them at one time, gratifying the cravings of our sinful nature and following its desires and thoughts. Like the rest, we were by nature objects of wrath. But because of his great love for us, God, who is rich in mercy, made us alive with Christ even when we were dead in transgressions— it is by grace you have been saved. And God raised us up with Christ and seated us with him in the heavenly realms in Christ Jesus, in order that in the coming ages he might show the incomparable riches of his grace, expressed in his kindness to us in Christ Jesus. For it is by grace you have been saved, through faith - and this not from yourselves, it is the gift of God - not by works, so that no one can boast. For we are God’s workmanship, created in Christ Jesus to do good works, which God prepared in advance for us to do.’

And so I invite you, ‘Come and drink!’”

9. The Session goes on to complain:

“Without this balance that continually points us to Christ’s perfect work on behalf of his people, Elder Kinnaird’s statements confound and confuse the doctrines of justification and sanctification: thus effectively teaching a doctrine of faith and

works.”

Analysis:

- a. What in the world is “a doctrine of faith and works”? Both *Paul and James* teach “a doctrine of faith and works”! Are they to be condemned with the appellant? *Perhaps* the Session’s document contains a typo here, but we cannot be sure. Maybe the Session *is* actually condemning “a doctrine of faith and works.” The words say as much.
- b. Further, we must ask, did the Session pay attention when Elder Kinnaird, during the course of the trial, pointed them to LC Q&A 77 as a place where justification and sanctification are set side-by-side, and their position of being inseparable but different is fully defined?

10. The Session quotes the appellant:

“These good works are a required condition if we would stand in the Day of Judgement and they are supplied by God to all His people. Every description of the Judgement events speak of these good works. Without them, no one will see God. Our God is not unjust...” and “Who are these people who thus benefit—who stand on the Day of Judgement? They are those who obey the law who will be declared righteous.”

Then, the Session complains:

“How could imperfect sanctification (imperfect *because* of our remaining sin), with its attempts at good works and law-keeping, be how we “stand on Judgment Day?...Elder Kinnaird’s words suggest: what is done by man (notwithstanding the gratuitous phrase that ‘they are supplied by God to all His people’) *is* what enables one to enter heaven. Thus again Christ’s work is improperly detracted from by glaring OMISSION. This leads to the erroneous conclusion that believers’ own works are required for being declared righteous at the Last Day.”

Analysis:

- a. The appellant does not say that the acquittal of Christians on the Day of Judgment will be *on the basis* of their good works that will provide the *ground* for them to enter heaven. He says, agreeable to Rom. 2:6, Rev. 20:13, WCF XXXIII:1 and LC 90, that the acquittal of Christians on the Day of Judgment will be “*according* to what they have done.”
- b. The quote used by the Session appears at the end of a paragraph found in the appellant’s e-mail that begins with these words:

“Now as to Works and Judgement. The good works of a Christian are in fact good. That is not to say that they are not tainted with sin. It is to say they are the work of God's Holy Spirit in us and they are thereby good. They merit nothing. They are but our duty. We who rest in faith in Christ are the beneficiaries of His grace whereby He again supplies that which he requires for our salvation. We are God's workmanship, created to do the good works which He has before ordained that we should do. By these good works we glorify God....”

We ask: “Does that sound like Elder Kinnaird is claiming perfection in our good works such that they merit our standing on the Day of Judgement?”

- c. When the Session writes, “*Elder Kinnaird’s words suggest: what is done by man (notwithstanding the gratuitous phrase that ‘they are supplied by God to all His people’) is what enables one to enter heaven*”, are they aware of Phillipians 2:12-13,

“Wherefore, my beloved, as ye have always obeyed, not as in my presence only, but now much more in my absence, work out your own salvation with fear and trembling. For it is God which worketh in you both to will and to do of his good pleasure.” Is Paul suggesting that what is done by man enables one to enter heaven? Is Paul being gratuitous when he adds, “For it is God which worketh in you...?”

d. When the appellant gives glory to God for his gracious provision of good works in the Christian’s life, following Eph. 2:10, he is again accused of authoring a “gratuitous phrase.”

e. The appellant is once more condemned by what he *doesn’t* say

f. Why is it an “erroneous conclusion” to affirm “that believers’ own works are required for being declared righteous at the Last Day”? Is not that the very teaching of Rev. 20:13, WCF XXXIII:1 and LC 90? Neither our primary nor subordinate standards, and certainly not the appellant, teach that the believers’ own works are the *ground* or *basis* of their acquittal on the Day of Judgment. *They* are not “how we stand on Judgment Day.” But they must be there, nonetheless. The Bible and our subordinate Standards say so. And so should we.

g. We note further that the Session again puts words in Elder Kinnaird’s mouth. He does not speak of the Christian’s works as being the believer’s *own* works; rather, he ever speaks of the believer’s works as being the work of God. For saying this, he is charged with being gratuitous.

We conclude, the Reasons given by the Session for their verdict are wholly inadequate to justify their verdict of “guilty.”

We now append an analysis of Romans 2:13 within its context of verses 5-16:

We must view Rom. 2:13 as falling within a context that:

- (1) fixes the venue in view as the final judgment at the last day,
- (2) insists upon both believers and unbelievers being present at that final judgment, and there either acquitted or condemned, and
- (3) affirms that God’s positive judgment (“glory and honor and peace”) will be according to works and “for everyone who does good.”

What, then, shall be done with Rom. 2:13, which, in that context, states that it is “the doers of the law who will be justified,” especially when later, in Rom. 3:20, the apostle warns that no one may expect to be justified “by works of the law”? Some, sensing this *apparent* contradiction, conclude that Rom. 2:13 must be understood as setting forth a hypothetical and, as a matter of fact, unreal situation.

But such is not necessary, for this reason: Rom. 2:13 can also be understood as indicating that the works that God the Holy Spirit produces in *every* believer (cf. Phil. 2:13) as the indispensable fruit of faith that is itself a gift of God, will be acknowledged *by* Him on the Day of Judgment, *according* to which (not, on the ground of which) He will render his positive acquittal. Those works will have been done by believers, who may thus be properly termed “doers of the law,” but their works will not have been done by themselves. They will *always and ever* be the product of the Holy Spirit and, though much defiled by the Christian’s remaining sin, will be acceptable solely and *only* by virtue of the Christian’s being united to Christ. Further, those works will be found

acceptable as proofs of God's righteousness in ushering the Christian into eternal life. Thus Romans 2:6 can likewise declare, "But because of your stubbornness and your unrepentant heart, you are storing up wrath against yourself for the day of God's wrath, when his righteous judgment will be revealed. God 'will give to each person according to what he has done.'" *According to*, not *on the ground of*—this point must be, and always has been, stressed; and works ("what he has done"), in the case of *believers*, as the necessary fruit and evidence of faith—this, too, must always be stressed.