

# The Curse of the Law, the Covenant, and Anthropology in Galatians 3:10–14: An Examination of Paul’s Use of Deuteronomy 27:26

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For many years, the view that Gal 3:10–14 addresses the anthropological inability of sinful humans to fulfill the law was nearly universal. This interpretation, however, has recently faced serious criticisms. One of the most influential alternative readings is that Gal 3:10–14 primarily addresses the issue of Israel’s corporate curse. I argue, however, that there are problems with this interpretation, despite its current popularity. A carefully nuanced version of the anthropological view provides a more satisfying reading of the text.

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A central issue in the interpretation of Gal 3:10–14 is the question of why Paul rejects the works of the law. For many years, it was thought that the answer to this question was clear: Paul rejects the works of the law because of his anthropological conviction that humans are unable to fulfill the law.<sup>1</sup> In recent times, however, this view has been subjected to significant criticisms, and alternative explanations have been sought. Discussion of the numerous proposals is beyond the scope of an article. My aim in this essay is to compare the traditional anthropological view with one of its most influential competitors: the view that Paul rejects the works of the

<sup>1</sup>This reading goes back at least to the fourth century; it is found in the works of both Ambrosiaster and John Chrysostom. See Ambrosiaster, *Comm. Gal. 3.10* (Ambrosiaster, *Commentaries on Galatians–Philemon*, ed. and trans. Gerald L. Bray, Ancient Christian Texts [Downers Grove, IL: IVP Academic, 2009], 16); John Chrysostom, *Hom. Gal. 3.10* (NPNF 1/13:26). Other significant older advocates of this view include Thomas Aquinas, *Commentary on Saint Paul’s Epistle to the Galatians*, trans. F. R. Larcher, Aquinas Scripture Series 1 (Albany: Magi, 1966), 80; John Calvin, *Galatians, Ephesians, Philippians and Colossians* [1548], Calvin’s New Testament Commentaries 11 (Grand Rapids: Eerdmans, 1965), 53; Martin Luther, *A Commentary on St. Paul’s Epistle to the Galatians*, based on the Middleton edition of the English version of 1575, trans. P. S. Watson (London: James Clarke, 1953), 245–46.

law because embracing the law places one under Israel's corporate curse. Although recent years have seen this latter view increasing in influence and the anthropological view on the decline, I suggest that this trend ought to be reversed.

Like the anthropological view, the corporate curse view places a great deal of weight on Paul's use of Deut 27:26 in Gal 3:10. I will begin, therefore, by presenting the anthropological reading of Gal 3:10, and then catalogue the objections that have led to this view's decline. After this, I will set forth the origins and arguments in favor of the corporate curse view, and then highlight the weaknesses of this proposal. Finally, I will argue that a carefully nuanced version of the anthropological view is able to answer all the major objections lodged against it and fits far better with statements in both the broader Pauline corpus and the preceding context in Galatians.

## I. THE ANTHROPOLOGICAL VIEW OF GALATIANS 3:10

In Gal 3:10, Paul writes, "For as many as are of works of the law are under a curse; for it is written, 'Cursed is everyone who does not remain in all the things written in the book of the law to do them.'"<sup>2</sup> Thus, Paul identifies a group with the label "as many as are of works of the law" and then declares this group to be "under a curse," citing Deut 27:26 in support of this claim. The problem, however, is that Deut 27:26 does not declare a curse on everyone who tries to obey the law, which appears to be the distinguishing feature of the group that Paul identifies, but rather on those who fail to obey the law. Nevertheless, advocates of the anthropological view claim that this gap in Paul's logic is easily explained by an unstated assumption, an implied premise. As John Calvin writes, "Either Paul reasons badly or it is impossible for men to fulfill the law."<sup>3</sup> Some advocates of this reading suggest that Paul believed that what was necessary was "perfect obedience" to the law, the complete avoidance of any transgression. But the universal characteristic of this view is that it attributes Paul's rejection of the works of the law to his anthropological conviction that, because humans are sinners, no one can fulfill the law and thereby avoid its curse.<sup>4</sup> Thomas R. Schreiner, one of the most ardent recent advocates of this view, lays out this flow of thought as a three point syllogism:

<sup>2</sup>Translations of biblical passages are my own.

<sup>3</sup>Calvin, *Galatians, Ephesians, Philippians and Colossians*, 53.

<sup>4</sup>For declarations that the requirement is "perfect obedience," see, e.g., A. Andrew Das, "Galatians 3:10: A 'Newer Perspective' on an Omitted Premise," in *Unity and Diversity in the Gospels and Paul: Essays in Honor of Frank J. Matera*, ed. Christopher Skinner and Kelly R. Iverson (Atlanta: Society of Biblical Literature, 2012), 203–23; Hans Hübner, "Gal 3,10 und die Herkunft des Paulus," *KD* 19 (1973): 215–31, here 215–16; Jason Meyer, *The End of the Law: Mosaic Covenant in Pauline Theology*, NAC Studies in Bible and Theology 6 (Nashville: B&H Academic, 2009), 153–55; Thomas R. Schreiner, "Is Perfect Obedience to the Law Possible? A Re-Examination of

Those who don't do everything required by the law are cursed. (v. 10b).  
 No one does everything required by the law (implied proposition).  
 Therefore, those who are of the works of the law are cursed (v. 10a).<sup>5</sup>

## II. CRITICISMS OF THE ANTHROPOLOGICAL VIEW

Despite the prevalence of this interpretation over the course of many centuries, the claim that Paul implies in Gal 3:10 that no one can fulfill the law has recently been subjected to a number of criticisms. Four primary objections have been lodged.

First, many have argued that the idea that no one can fulfill the law would have been novel and unpersuasive to Paul's Jewish contemporaries because means of atonement for sin were available within the law itself through the sacrificial system.<sup>6</sup>

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Galatians 3:10," *JETS* 27 (1984): 151–60. Other notable recent advocates of the anthropological view include Michael Bachmann, "Zur Argumentation von Gal 3.10–12," *NTS* 53 (2007): 524–44; A. Andrew Das, *Paul, the Law, and the Covenant* (Peabody, MA: Hendrickson, 2001), 145–70; William J. Dumbrell, "Abraham and the Abrahamic Covenant in Galatians 3:1–14," in *Gospel to the Nations: Perspectives on Paul's Mission; In Honor of Peter T. O'Brien*, ed. Peter Bolt and Mark Thompson (Downers Grove, IL: InterVarsity Press, 2000), 19–31, here 23–24; Hans-Joachim Eckstein, *Verheißung und Gesetz: Eine exegetische Untersuchung zu Galater 2,15–4,7*, WUNT 86 (Tübingen: Mohr Siebeck, 1996), 121–33; Seyoon Kim, *Paul and the New Perspective: Second Thoughts on the Origin of Paul's Gospel* (Grand Rapids: Eerdmans, 2002), 128–64; Peter Lampe, "Paulus, der Apostel der Völker: Reticentia in der Argumentation; Gal 3,10–12 als Stipatio Enthymematum," in *Das Urchristentum in seiner literarischen Geschichte: Festschrift für Jürgen Becker zum 65. Geburtstag*, ed. Ulrich Mell and Ulrich B. Müller, BZNW 100 (Berlin: de Gruyter, 1999), 27–39; Bruce W. Longenecker, *The Triumph of Abraham's God: The Transformation of Identity in Galatians* (Nashville: Abingdon, 1998), 134–42; Barry Matlock, "Helping Paul's Argument Work? The Curse in Galatians 3.10–14," in *The Torah in the New Testament: Papers Delivered at the Manchester-Lausanne Seminar of June 2008*, ed. Michael Tait and Peter Oakes, LNTS 401 (London: T&T Clark, 2009), 154–79; Douglas J. Moo, *Galatians*, BECNT (Grand Rapids: Baker, 2013), 201–5; Guy Waters, *The End of Deuteronomy in the Epistles of Paul*, WUNT 2/221 (Tübingen: Mohr Siebeck, 2006), 79–113.

<sup>5</sup>Thomas R. Schreiner, *Galatians*, Zondervan Exegetical Commentary on the New Testament 9 (Grand Rapids: Zondervan, 2010), 204.

<sup>6</sup>Jean Noël Aletti, "L'argumentation de Ga 3,10–14, une fois encore: Difficultés et propositions," *Bib* 92 (2011): 182–203, here 187; Michael Cranford, "The Possibility of Perfect Obedience: Paul and an Implied Premise in Galatians 3:10 and 5:3," *NovT* 36 (1994): 242–58, here 243, 257; Sigurd Grindheim, "Apostate Turned Prophet: Self-Understanding and Prophetic Hermeneutic with Special Reference to Galatians 3.10–12," *NTS* 53 (2007): 545–65, here 559; Daniel Marguerat, "L'évangile paulinien de la justification par la foi," in *Paul et l'unité des chrétiens*, ed. J. Schlosser et al., ACEP 19 (Leuven: Peeters, 2010), 33–81, here 41–42; Esau McCaulley, *Sharing in the Son's Inheritance: Davidic Messianism and Paul's Worldwide Interpretation of the Abrahamic Land Promise in Galatians*, LNTS 608 (London: Bloomsbury T&T Clark, 2019), 116; Kjell Arne Morland,

Second, a few suggest that the Jewish Scriptures themselves, particularly Deut 30:11–14 and passages that speak of humans as “righteous,” teach that the fulfillment of the law is not beyond human capacity. These scholars further claim that Paul would not have disagreed so blatantly with the texts that he viewed as authoritative.<sup>7</sup>

Third, many opponents of this interpretation claim that Paul contradicts the view that no one fulfills the law when he describes himself in Phil 3:6 as having been “blameless” with respect to “righteousness in the law.”<sup>8</sup>

Fourth, some assert that Paul never explicitly states that it is impossible to fulfill the law, and a few propose alternative readings for texts that have been presented as expressions of this conviction, especially Gal 5:3 and 6:13.<sup>9</sup>

A number of scholars believe that these critiques are fatal to the anthropological view of Gal 3:10 and have pursued alternative explanations for the logic of Gal 3:10–14. Among the proposals that have emerged, the view that Paul has in mind a corporate curse on the nation of Israel has gained significant traction.

### III. THE CORPORATE CURSE VIEW OF GALATIANS 3:10

The idea that Deuteronomy’s corporate curse stands as the background to Gal 3:10 came to prominence around the year 1990 when four studies that made suggestions along these lines appeared in quick succession. Remarkably, these four

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*The Rhetoric of Curse in Galatians: Paul Confronts Another Gospel*, ESEC 5 (Atlanta: Scholars Press, 1995), 10; E. P. Sanders, *Paul, the Law, and the Jewish People* (Minneapolis: Fortress, 1993), 28–29; James M. Scott, “‘For as Many as Are of Works of the Law Are under a Curse’ (Galatians 3.10),” in *Paul and the Scriptures of Israel*, ed. Craig A. Evans and James A. Sanders, JSNTSup 83 (Sheffield: JSOT Press, 1993), 187–221, here 188–89; N. T. Wright, *The Climax of the Covenant: Christ and the Law in Pauline Theology* (Minneapolis: Fortress, 1991), 145; Norman H. Young, “Who’s Cursed—And Why (Galatians 3:10–14),” *JBL* 117 (1998): 79–92, here 83.

<sup>7</sup>Aletti, “L’argumentation de Ga 3,10–14,” 187; Don B. Garlington, “Role Reversal and Paul’s Use of Scripture in Galatians 3.10–13,” *JSNT* 65 (1997): 85–121, here 110–11; Scott, “For as Many,” 188–89.

<sup>8</sup>Aletti, “L’argumentation de Ga 3,10–14,” 187; Cranford, “Possibility of Perfect Obedience,” 256–57; Grindheim, “Apostate Turned Prophet,” 559; Rodrigo J. Morales, *The Spirit and the Restoration of Israel: New Exodus and New Creation Motifs in Galatians*, WUNT 2/282 (Tübingen: Mohr Siebeck, 2010), 88; Wolfgang Reinbold, “Gal 3,6–14 und das Problem der Erfüllbarkeit des Gesetzes bei Paulus,” *ZNW* 91 (2000): 91–106, here 104; Sanders, *Paul, the Law*, 23–24; Scott, “For as Many,” 188–89; Wright, *Climax of the Covenant*, 145.

<sup>9</sup>Timothy G. Gombis, “The ‘Transgressor’ and the ‘Curse of the Law’: The Logic of Paul’s Argument in Galatians 2–3,” *NTS* 53 (2007): 81–93, here 82–84; David Lincicum, *Paul and the Early Jewish Encounter with Deuteronomy*, WUNT 2/284 (Tübingen: Mohr Siebeck, 2010), 143; Marguerat, “L’évangile paulinien,” 41–42; Morales, *Spirit and the Restoration*, 88; Reinbold, “Gal 3,6–14,” 100–102; Sanders, *Paul, the Law*, 23–25, 27–29.

studies seem to have developed independently of one another, and their near-simultaneous appearance suggests that this was an idea whose time had come.

First came the published version of Frank Thielman's doctoral dissertation, in which he claims that readers in Paul's day would have understood the curses of Deut 28 as a set of corporate consequences that had already come upon the people. This, he claims, is the key to Paul's use of Deut 27:26: Paul's intention is to evoke Israel's incurring of the corporate covenantal curse in order to support the point that the law cannot be kept.<sup>10</sup>

Second was an article written by Ardel Caneday, who argues that the text-type of Deut 27:26 in Gal 3:10 gives evidence of conflation with Deut 28:61. He concludes that this conflation signals Paul's intention to evoke the corporate curses of Deut 28. Like Thielman, Caneday proposes that Paul intends to remind his readers that this curse has already come and remains upon the people of Israel. According to Caneday, Paul's point is that for the Galatians to adopt the law would be "to join themselves to the old nation, Israel, which is subjected to the curse of the violated covenant."<sup>11</sup> Caneday seeks to bolster this salvation-historical reading of the curse by claiming that the blessing of the gentiles and the gift of the Spirit in Gal 3:14 represent the effects of the salvation-historical turn effected through Christ's redemption of Israel from the law's curse.<sup>12</sup>

Third, N. T. Wright, in *Climax of the Covenant*, proposes an interpretation that is in many ways parallel to that of Caneday. The most distinctive feature of Wright's approach, however, is that he identifies the curse in view specifically with what he refers to as the "curse of all curses": the exile.<sup>13</sup> Wright suggests that Paul's citation of Deut 27:26 plays on the widespread Jewish belief that, despite the physical return to the land, the people of Israel remained in exile because the promised covenant renewal of Deut 30 had not yet taken place. Wright further claims that the presence of the Spirit in Gal 3:14 supports this reading because the gift of the Spirit is, for Paul, the blessing of the renewed covenant envisioned in Deut 30.<sup>14</sup> He sums up his reading with the following syllogism:

- a. All who embrace Torah are embracing Israel's national way of life;
- b. Israel as a nation has suffered, historically, the curse which the Torah held out for her if she did not keep it;
- c. Therefore all who embrace Torah now are under this curse.<sup>15</sup>

<sup>10</sup>Frank Thielman, *From Plight to Solution: A Jewish Framework for Understanding Paul's View of the Law in Galatians and Romans*, NovTSup 61 (Leiden: Brill, 1989), 67–69; cf. David I. Starling, *Not My People: Gentiles as Exiles in Pauline Hermeneutics*, BZNTW 184 (Berlin: de Gruyter, 2011), 48–52.

<sup>11</sup>Ardel Caneday, "Redeemed from the Curse of the Law": The Use of Deut 21:22–23 in Gal 3:13," *TJ* 10 (1989): 185–209, here 195.

<sup>12</sup>*Ibid.*, 205.

<sup>13</sup>Wright, *Climax of the Covenant*, 140.

<sup>14</sup>*Ibid.*, 140–41, 145–48, 153–55.

<sup>15</sup>*Ibid.*, 147.

Fourth, James M. Scott wrote an essay that similarly focuses on the curse of exile as the background of Gal 3:10. He begins by arguing that the text-form of Paul's citations suggests that he has the whole of Deut 27–32 in view,<sup>16</sup> and he then suggests that these chapters present the history of Israel as entailing a pattern of sin, exile, and restoration. He provides a lengthy survey of Jewish literature in order to demonstrate that many Jews believed that the period of exile had been extended. He thus reads Gal 3:10–14 as stating that the law led to a curse on Israel and is therefore clearly not the path to restoration and the reception of the Spirit, which is instead given to those who participate in the redemption from the curse provided through Christ.<sup>17</sup>

In subsequent years, many have claimed that the proposal that Paul has in mind a corporate curse on Israel as a whole provides a way through the interpretive wilderness.<sup>18</sup> Although some recent advocates have questioned whether the identification of the curse as exile is necessary or helpful,<sup>19</sup> the central features and basic arguments in favor of this view have remained the same.<sup>20</sup>

#### IV. EVALUATING THE CORPORATE CURSE VIEW

In order to evaluate the corporate curse view, we need to address four primary topics: (1) the meaning of Deut 27:26 in its original literary context; (2) the interpretation of Deut 27:26 in the Jewish tradition; (3) the significance of the conflated nature of Paul's citation of Deut 27:26; (4) the rationale behind the presence of the Spirit in Gal 3:14.

<sup>16</sup>Scott, "For as Many," 194–95; he points out that elements of Paul's wording are similar to Deut 28:61; 29:20, 26; 30:10.

<sup>17</sup>Ibid., 195–217.

<sup>18</sup>E.g., Roy E. Ciampa, "Deuteronomy in Galatians and Romans," in *Deuteronomy in the New Testament*, ed. Maarten J. J. Menken and Steve Moyise, LNTS 358 (London: T&T Clark, 2007), 99–117, here 101–3; Garlington, "Role Reversal," 110–11; Scott J. Hafemann, "Paul and the Exile of Israel in Galatians 3–4," in *Exile: Old Testament, Jewish, and Christian Conceptions*, ed. James M. Scott, JSJSup 56 (Leiden: Brill, 2000), 329–71, here 358–59; Lincicum, *Paul and the Early Jewish Encounter*, 142–47; Morales, *Spirit and the Restoration*, 91–96; C. Marvin Pate, *The Reverse of the Curse: Paul, Wisdom, and the Law*, WUNT 2/114 (Tübingen: Mohr Siebeck, 2000), 147–48; Preston M. Sprinkle, *Paul and Judaism Revisited: A Study of Divine and Human Agency in Salvation* (Downers Grove, IL: IVP Academic, 2013), 82–86; Francis Watson, *Paul and the Hermeneutics of Faith* (London: T&T Clark, 2004), 427–34; Joel Willitts, "Context Matters: Paul's Use of Leviticus 18:5 in Galatians 3:12," *TynBul* 54 (2003): 105–22, here 120–21.

<sup>19</sup>E.g., Lincicum, *Paul and the Early Jewish Encounter*, 144 n. 78; Morales, *Spirit and the Restoration*, 94–95, 106–9; Sprinkle, *Paul and Judaism*, 83–84.

<sup>20</sup>A few studies have sought to bolster some of the lines of argument, and I will address these contributions in the evaluative section below.

### *Deuteronomy 27:26 in Its Original Literary Context*

As we have seen, the original literary context of Deut 27:26 plays an important role in the argument for the corporate curse view. According to Wright, "What is envisaged ... is not so much the question of what happens *when this or that individual sins*, but the question of what happens *when the nation as a whole fails to keep the Torah as a whole*."<sup>21</sup> Many critics, however, suggest that the curse in Deut 27:26 is individual rather than corporate.<sup>22</sup> The following evidence suggests that the critics are correct.

In its literary context, Deut 27:26 serves as the conclusion to a litany of twelve curses that are to be recited as a part of a ceremony that Moses commands the people to hold after they have entered the promised land. The description of this ceremony in chapter 27 expands on a brief reference to the same ceremony in Deut 11:29–30, and these two passages likely form a part of a literary frame around the central section recounting the laws in chapters 12–26.<sup>23</sup>

According to Deut 27, the ceremony is to begin with the inscription of the law on large stones and the offering of burnt offerings on Mount Ebal. Following this, the people are to divide into two groups. Half are to stand on Mount Gerizim "to bless the people," and the other half on Mount Ebal "for the curse" (27:11–12). The text does not, however, go on to say anything else about blessings. Instead, the Levites are ordered to proclaim twelve curses, and the people are commanded to respond to each curse with the word "Amen."

Scholars have proposed a few different interpretations for the meaning of this ceremony. One approach suggests that the ceremony has a function similar to that of the law in Deut 21:1–9 dealing with unsolved murders. Advocates of this view claim that the point of the ceremony is to eliminate the community's culpability for sins committed in secret by pronouncing a curse on the individuals who commit these sins.<sup>24</sup>

Alternatively, Andrew E. Hill claims that Deut 27 is a variation of the ancient Near Eastern land grant ceremony reflected in Babylonian *kudurru*. The implicit

<sup>21</sup> Wright, *Climax of the Covenant*, 146 (emphasis original).

<sup>22</sup> E.g. Das, *Paul, the Law*, 151–53; Gombis, "'Transgressor' and the 'Curse,'" 84 n. 10; Grindheim, "Apostate Turned Prophet," 560; Matlock, "Helping Paul's Argument," 167–69; Moo, *Galatians*, 204; Jeffrey R. 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), 49–50.

<sup>23</sup> J. G. McConville, *Deuteronomy*, AOTC 5 (Downers Grove, IL: InterVarsity Press, 2002), 387; see also Daniel I. Block, "'What Do These Stones Mean?' The Riddle of Deuteronomy 27," *JETS* 56 (2013): 17–41, here 19–20.

<sup>24</sup> E.g., Elizabeth Bellefontaine, "The Curses of Deuteronomy 27: Their Relationship to the Prohibitives," in *No Famine in the Land: Studies in Honor of John L. McKenzie*, ed. James N. Flanagan and Anita Weisbrod Robinson, Homage Series 2 (Missoula, MT: Scholars Press, 1975), 49–61, here 52–58; Das, *Paul, the Law*, 152; McConville, *Deuteronomy*, 392–97.



blessing, he claims, is the land itself, and the list of cursed people in Deut 27 “is reminiscent of the acts of violence prohibited by the curses of the land grant—for example, removal of boundary markers (27:17) and the failure to obey the stipulations of the grant (27:26).”<sup>25</sup> Hill concludes that the Ebal ceremony is depicted as the completion of Israel’s covenant renewal at Moab, which “can be enacted meaningfully only when Israel resides in the land of promise.”<sup>26</sup>

Others, however, understand the ceremony of Deut 27 to be a separate renewal of the covenant that is meant to mark the momentous occasion of Israel’s entry into the land. Advocates of this view suggest that the emphasis on secrecy in some of the curses is not an effort to remove corporate culpability for these sins but rather an expression of the extent of each individual’s personal responsibility to the whole of the Deuteronomic law.<sup>27</sup>

Among these approaches, the third appears to be the best. The first view falters because the theme of secrecy is not consistent throughout the passage, and the final curse implies that the ceremony entails a commitment to obedience to the whole law, not merely the private acts that are explicitly mentioned.<sup>28</sup>

The view that this passage describes an ancient Near Eastern land grant ceremony has obvious appeal for those who want to claim that the curse in view in Gal 3:10 is exile/expulsion from the land, but Hill’s argument has significant weaknesses. Unlike the *kudurru* inscriptions that he describes, Deut 27 mentions no boundary stones for the land, there is no survey of the land and its borders, none of the parties are described as “witnesses,” and the behavior prohibited in the curses extends far beyond legal claims against the land and acts of violence in connection with the land exchange.<sup>29</sup> Additionally, Hill’s claim that the focus of the ceremony is the gift of the land, which implies that the curse in view is the revocation of the land grant, conflicts with the fact that the curses address sins that can be committed only by individuals and they proclaim accursed only the individuals who commit these sins.

<sup>25</sup> Andrew E. Hill, “The Ebal Ceremony as Hebrew Land Grant?” *JETS* 31 (1988): 399–406, here 403.

<sup>26</sup> *Ibid.*, 403; see the similar approach in Block, “What Do These Stones Mean?,” 20–21. Block, however, attempts to refine Hill’s approach on the basis of the research on Babylonian boundary stone inscriptions presented in Kathryn E. Slanski, *The Babylonian Entitlement narûs (kudurru): A Study in Their Form and Function*, ASOR Books 9 (Boston: American Schools of Oriental Research, 2003).

<sup>27</sup> E.g., Duane L. Christensen, *Deuteronomy 21:10–34:12*, WBC 6B (Nashville: Nelson, 2002), 656–63; Peter C. Craigie, *The Book of Deuteronomy*, NICOT (Grand Rapids: Eerdmans, 1976), 326–34; Jack R. Lundbom, *Deuteronomy: A Commentary* (Grand Rapids: Eerdmans, 2013), 743–51.

<sup>28</sup> See Eckart Otto, *Deuteronomium 12–34*, 2 vols., HThKAT (Freiburg im Breisgau: Herder, 2016–2017), 2:1925.

<sup>29</sup> See the description of the *kudurru* inscriptions in Hill, “Ebal Ceremony,” 402.



Therefore, the most likely view of the ceremony described in Deut 27 is that it is a covenant renewal ceremony that is meant to remind the people of their responsibility to God's law upon the momentous occasion of their entrance into the promised land. Within this ceremony, Deut 27:26 serves as a summary curse that expresses the people's individual responsibility for the Deuteronomic law: "Cursed is the one who does not uphold the words of this law by doing them."

Thus, in its original literary context, Deut 27:26 does not refer to a corporate curse, and this weakens the case of those who say that the key to Gal 3:10–14 is the concept of a corporate curse on Israel. If Paul had meant to evoke this concept, he could easily have chosen to cite a text that explicitly referred to it (e.g., Dan 9:11).

### *Deuteronomy 27:26 in the Jewish Tradition*

Another important aspect of the case for the corporate curse view is how other ancient Jewish authors understood this passage. One of the strengths of Scott's article is that he roots his proposal in an extensive study of Jewish interpretations of Deut 27–32. David Lincicum's recent study has further established that Jewish interpreters from Paul's era often read Deut 27–32 as a map for the history of Israel, although he finds a variety of opinions on both the particular shape of that map and Israel's current place on it.<sup>30</sup> Unfortunately, neither Scott nor Lincicum spends time considering how Jewish authors treat Deut 27:26 itself. This question, however, is highly significant. If there is no evidence that Jewish interpreters from Paul's era associated this verse with a corporate curse, the claim that Paul could have expected his audience to hear it in this way loses a great deal of force.

The textual and translational traditions of Deut 27:26 do not contain any significant deviations that would suggest a corporate understanding. The version preserved in the Dead Sea Scrolls, 4QDeut<sup>c</sup> (4Q30), is very fragmentary and exhibits no variation from the MT. The Samaritan Pentateuch adds only the word "all" before "the words of this law," thereby making explicit the scope of the commandments in view. The LXX slightly alters the main verb and adds two occurrences of the word *πᾶς*, emphasizing the applicability of the whole of the law to every individual within the people of Israel: "Cursed be every person [*πᾶς ἄνθρωπος*] who does not remain in all the words [*πᾶσιν τοῖς λόγοις*] of this law by doing them."

In the targumic tradition, Targum Onqelos and Targum Neofiti reproduce Deut 27:26 with no significant alterations. Targum Pseudo-Jonathan similarly makes no major adjustments to the wording of this verse, although it adds a further description of the ceremony and a corresponding blessing on the one who does keep the words of the law. The addition of this blessing is likely due to embarrassment over the fact that Deut 27:12–13 gives the impression that the ceremony will

<sup>30</sup>See Lincicum, *Paul and the Early Jewish Encounter*, passim.

involve blessings and curses but then describes only the proclamation of curses in verses 15–26.<sup>31</sup>

Thus, the main adjustments to Deut 27:26 in the textual and translational traditions appear to be aimed at either making points explicit that are implicit in the MT itself or fixing problems created by the MT. None of these adjustments suggests that the passage should be understood as a corporate rather than an individual curse.

We now turn to other texts that interact with Deut 27:26. Within the Jewish Scriptures, one passage clearly alludes to Deut 27:26: Jer 11:3–5. According to Preston Sprinkle, Jer 11:3–5 supports the corporate curse view because it demonstrates how a Jewish author could interpret Deut 27:26 corporately.<sup>32</sup> The passage states:

You shall say to them, “Thus says YHWH, the God of Israel: Cursed be the person who does not listen to the words of this covenant that I commanded your fathers in the day I brought them out from the land of Egypt, from the iron furnace, saying, ‘Listen to my voice and do all that I command you, and you shall be my people, and I will be your God, so that I might establish the oath which I swore to your fathers, to give to them a land flowing with milk and honey, as it is this day.’” And I said, “Amen, YHWH.”

The allusions to Deut 27:26 here are transparent, from the phrasing of the curse to Jeremiah’s response of “Amen,”<sup>33</sup> and it is true that Jeremiah goes on to speak of the punishment that is coming on the whole of Judah for their failure to obey the covenant. Nevertheless, Jer 11:7–8 suggests that the curse is not limited to these corporate consequences. According to this passage, God states:

For I surely warned your fathers in the day I brought them up from the land of Egypt, even to this day, warning them persistently, saying, “Listen to my voice.” But they did not listen, and they did not incline their ears, and they walked, each person, in the stubbornness of their evil hearts. And I brought on them all the words of this covenant, which I commanded them to do, but they did not do.

Two things should be noted. First, God claims that the people have failed to obey his covenant from the exodus until Jeremiah’s day. Second, God states that he has responded to this disobedience by bringing the threatened curses, “all the words of

<sup>31</sup> Targum Pseudo-Jonathan also adds a blessing before the first curse in Deut 27:15, as does Targum Neofiti.

<sup>32</sup> Sprinkle, *Paul and Judaism*, 85–86.

<sup>33</sup> Cf. Wisdom, *Blessing for the Nations*, 57–59; for extensive surveys of Deuteronomical influence in this passage, see Peter C. Craigie, Page H. Kelley, and Joel F. Drinkard Jr., *Jeremiah 1–25*, WBC 26 (Dallas: Word, 1991), 168; William L. Holladay, *Jeremiah 1: A Commentary on the Book of the Prophet Jeremiah, Chapters 1–25*, Hermeneia (Philadelphia: Fortress, 1986), 350–51.

this covenant,” on those who disobeyed.<sup>34</sup> This suggests that Deut 27:26 is being treated not as a direct and exclusive reference to the impending national doom that Jeremiah was sent to proclaim but rather as a comprehensive warning about the consequences of disobedience to the covenant. These consequences have come on individuals throughout Israel's history, and the consequences that the nation now faces appear to be a further enactment of this long trajectory.

Deuteronomy 27:26 did not receive a great deal of attention in the Second Temple period, but there are interactions with the broader passage in both the Dead Sea Scrolls and Josephus's *Jewish Antiquities*. 1QS II, 5–18 describes a ceremony that appears to be modeled on Deut 27 with the pronouncement of curses by priests and Levites, to which the covenanters respond with a double “Amen.” The significant point for our purposes is that this ceremony is clearly meant to curse the individuals who fail to uphold the covenant, not to bind the community as a whole to corporate consequences, and the author of this text saw Deut 27 as a model for this ceremony of individual commitment.

In A.J. 4.8.44 §§305–308, Josephus provides a description of the ceremony recounted in Deut 27. He does not reproduce the twelve curses in detail, but his summary suggests that he understood them to apply to individuals rather than the nation. He writes that Moses commanded the people to “place curses on those who would transgress” (§307).

Deuteronomy 27:26 also appears in several discussions in rabbinic literature. In t. Soṭah 8:9–10, a rabbi identifies Deut 27:26 as a general curse in contrast to the particular curses of the previous eleven verses. A similar thought is expressed in Num Rab. 9:47, which claims that the double “Amen” pronounced by a woman accused of adultery alludes to both Deut 27:15 and Deut 27:26, the specific and the general curse.<sup>35</sup> Leviticus Rabbah 25:1, Eccl. Rab. 7:12, and y. Soṭah 7:4 all suggest that the verb “uphold” in Deut 27:26 means to provide financial support to those who study the law, claiming that those who do so are blessed regardless of whether they observe the law themselves.<sup>36</sup> In both b. Šebu. 36a and Deut. Rab. 27:26, Deut 27:26 appears in discussions of the meaning of the term “Amen,” supporting the point that “Amen” implies consent or acceptance of what is said. Finally, Num. Rab. 14:6 appeals to Deut 27:26 as proof that a person is bound to God's commands by an oath and therefore must obey God over any human authority. The salient point to draw from this brief survey is that the rabbis do not appeal to Deut 27:26 to

<sup>34</sup> See esp. William McKane, *A Critical and Exegetical Commentary on Jeremiah*, 2 vols., ICC (London: Bloomsbury T&T Clark, 2001–2014), 1:238.

<sup>35</sup> See also y. Soṭah 7:4 and b. Soṭah 37a, both of which contain the comment about general and particular curses in the context of speaking about Deut 27, but without explicitly quoting 27:26.

<sup>36</sup> Y. Soṭah 7:4 also includes a few other opinions; see Morland, *Rhetoric of Curse*, 207.

discuss a corporate curse or the exile; their comments consistently suggest that they understood the curse to be one that applies to individuals.

Thus, there is little evidence in ancient Jewish literature that Deut 27:26 was interpreted as a reference to a curse on the people of Israel as a whole. The only text that possibly points in this direction is Jer 11:3–5, but this passage goes on to speak not only of the impending national disaster but also of the punishments that individuals have brought on themselves throughout Israel's history. Thus, even Jeremiah's treatment of Deut 27:26 includes the individual emphasis that dominates all other interactions with this passage. Jeremiah's treatment is hardly enough to justify the claim that an ancient Jewish author could assume that his audience would hear a reference to Deut 27:26 as a reference to a corporate curse. Among the actual instances of Jewish interpretations that have survived, the opposite appears to be the rule. This raises significant questions about the validity of the corporate curse view.

### *The Significance of the Conflated Nature of Paul's Citation of Deuteronomy 27:26*

As noted above, some advocates of the corporate curse view admit that Deut 27:26 has in view an individual curse, but they claim that the mixed nature of Paul's citation signals his intent to refer to a corporate curse. The fact that Paul embeds within his quotation a phrase that occurs throughout Deut 27–30, they claim, demonstrates that Paul has this broader context and therefore a corporate curse in view.<sup>37</sup> This argument, however, is problematic.

If the words that Paul had embedded in his citation were a clear and unambiguous reference to a corporate curse, this argument would carry significant weight, but this is not the case. Paul's citation reads, "Cursed be everyone [πᾶς] who does not remain in all the things written in the book of the law [πᾶσιν τοῖς γεγραμμένοις ἐν τῷ βιβλίῳ τοῦ νόμου] to do them." Thus, Paul substitutes the phrase "all the things written in the book of the law" in place of the phrase "the words of this law." At least on the face of it, this is not the inclusion of a specific reference to a corporate curse but instead the substitution of one description of the commandments that the people are obliged to obey in place of another.

Nevertheless, several of the verses that scholars have suggested Paul here evokes do, in fact, speak of curses. This is true of Deut 29:19, 20, 26. The first two of these, however, clearly speak of curses on individuals rather than the nation. More importantly, Paul does little to indicate that he has any single verse

<sup>37</sup> Caneday, "Redeemed from the Curse," 195; Scott, "For as Many," 194–95; cf. the reiterations of this argument in Ciampa, "Deuteronomy in Galatians," 102–3; Lincicum, *Paul and the Early Jewish Encounter*, 144; Morales, *Spirit and the Restoration*, 92–93; Sprinkle, *Paul and Judaism*, 84–85; Watson, *Paul and the Hermeneutics*, 431–32.

particularly in mind. The wording of Gal 3:10 is similar to Deut 28:58, 61; 29:19, 20, 26; and 30:10, but none of these texts provides an exact match.<sup>38</sup>

The question, then, is whether this rewording is intended to point to a national curse simply by indicating that the broader context of Deut 27–32 is in view. This proposal is unlikely. Even if Paul's adjustment were meant to suggest the broader context of chapters 27–32, this does not establish which elements from the broader context he meant to evoke. A. Andrew Das also argues that the mixed citation points to the broader context of Deut 27–32, but he suggests that what Paul intends to carry over from that context is the striking pessimism that Deuteronomy expresses regarding the people's ability to obey the law.<sup>39</sup> This counterproposal has not gained a large following, but it does effectively illustrate the ambiguity of the claim that Paul has the broader context in mind.

The biggest problem with this argument, however, is that it suggests that Paul's evocation of the broader context of Deut 27–32 overrides the meaning of 27:26 itself. What this argument proposes is that Paul added a secondary allusion to 27:26 in order to indicate that the referent he has in mind is not actually the curse that 27:26 proclaims but rather the corporate curse mentioned in subsequent chapters. The alterations that Paul makes to Deut 27:26 are simply too small to signal this whole train of thought, and other examples of Paul making small adjustments in wording in order to signal a similar change of referent are lacking.

As many have suggested, the significance of Paul's alteration to Deut 27:26 is most likely that it clarifies a potential ambiguity in the citation. The phrase "the words of this law" could have proved ambiguous for those who were not familiar with the broader context of the passage, but "all the things written in the book of the law" makes clear that what is in view is obedience to the whole of the Mosaic law.<sup>40</sup> This explanation has an elegant simplicity that suggests that it is far superior to more complicated alternatives, including both Das's proposal and the proposals of advocates of the corporate curse view.

### *The Rationale behind the Presence of the Spirit in Galatians 3:14*

The final aspect to consider in the case for the corporate curse view is the claim that the presence of the Spirit in Gal 3:14 demonstrates that Paul has a corporate curse in mind. As noted above, several of the original proponents of the corporate curse view argue along these lines, but the case for this point is presented most forcefully in a recent monograph by Rodrigo J. Morales, who argues that both the prophetic literature of the Jewish Scriptures and numerous Second Temple texts

<sup>38</sup> See Waters, *End of Deuteronomy*, 80–86; Watson, *Paul and the Hermeneutics*, 431–33.

<sup>39</sup> Das, "Galatians 3:10," 205–10.

<sup>40</sup> See Bachmann, "Zur Argumentation von Gal 3.10–12," 527; Eckstein, *Verheißung und Gesetz*, 125.

strongly associate the gift of the Spirit with the event of Israel's restoration.<sup>41</sup> Furthermore, he claims, Gal 3:14 is likely drawing on Isa 44:3 in particular, as it is the only passage from the Jewish Scriptures that links the terms "Spirit" and "blessing." This is significant because Isa 44:3 is an important text that connects the Spirit with Israel's restoration, and in the Jewish tradition this passage was interpreted as a prophecy of the gift of the Spirit at the time when the nation as a whole is redeemed from the curse of the law.<sup>42</sup>

These arguments have some real force; nevertheless, they are not ultimately persuasive. A few factors suggest that the presence of the Spirit here does not necessarily mean that Paul has a corporate curse in mind. First, this position underestimates the significance of the fact that the reference to the Spirit in Gal 3:14 forms an *inclusio* with the discussion of the Galatians' reception of the Spirit in Gal 3:2–5.<sup>43</sup> This connection makes it likely that the (largely gentile) Galatians would have read Gal 3:14 in relation to their own experience of the Spirit and not as an indication that a corporate curse on Israel is in view. Further, in thematically parallel passages in Paul's letters, significant references to the Spirit occur in contexts where the plight in view is death. Romans 7:7–8:11 speaks of the Spirit as providing "life because of righteousness," and it presents this as a consequence of the reversal of the condemnation that results from sin's co-opting the law in order to bring death. Additionally, in 2 Cor 3:1–18, the central contrast is between the Spirit, who gives life as a part of the "ministry of righteousness," and the "letter" of the law, which kills as a part of the "ministry of condemnation." Like Gal 3:10–14, both of these passages bring together the themes of righteousness, life, the law, and the Spirit, and the plight in view is not a national curse on Israel but rather the death that results from failing to obey the law.

In addition, the verses preceding Gal 3:14 suggest that here also death is the primary plight in view. In Gal 3:11–12, Paul contrasts the justification that believers attain with the potential of justification through the law by coordinating each with a verse from the Jewish Scriptures. The important point to note for our purposes is that the main verb in both of the verses that Paul cites is ζῶω; Paul presents the central contrast as one of different means for attaining life.<sup>44</sup> This implies, in

<sup>41</sup> Morales, *Spirit and the Restoration*, 13–77.

<sup>42</sup> *Ibid.*, 109–14; see also Rodrigo J. Morales, "The Words of the Luminaries, the Curse of the Law, and the Outpouring of the Spirit in Gal 3,10–14," *ZNW* 100 (2009): 269–77; Starling, *Not My People*, 51.

<sup>43</sup> This connection is noted in Bachmann, "Zur Argumentation von Gal 3.10–12," 531–32; Moisés Mayordomo-Marín, *Argumentiert Paulus logisch? Eine Analyse vor dem Hintergrund antiker Logik*, WUNT 188 (Tübingen: Mohr Siebeck, 2005), 131; Christopher D. Stanley, "'Under a Curse': A Fresh Reading of Galatians 3.10–14," *NTS* 36 (1990): 481–511, here 493; Waters, *End of Deuteronomy*, 103.

<sup>44</sup> See Eckstein, *Verheißung und Gesetz*, 146–49; Debbie Hunn, "Galatians 3.10–12: Assumptions and Argumentation," *JSNT* 37 (2015): 253–66, here 258–60; Lampe, "Reticentia in der Argumentation," 30–32; Watson, *Paul and the Hermeneutics*, 348–53; contra Willitts, "Context Matters,"

turn, that the primary plight that Paul has in view in Gal 3:10–14 is, as in Romans and 2 Corinthians, the opposite of life: death.

Further support for this interpretation is found in the fact that Moses's climactic speech in Deut 30 actually identifies death as the ultimate curse. Moses states, "I call heaven and earth to bear witness among you today, that I have set before you life and death, the blessing and the curse" (30:19).<sup>45</sup> At one point, even Wright, despite his reference to exile as "the curse of all curses," recognizes the primacy of death as the curse. In his discussion of Paul's use of Hab 2:4 in this passage, Wright states, "'Life' is the chief blessing of the covenant, as death is its chief curse."<sup>46</sup>

Ironically, Morales himself also argues that the curse of the law in view in Gal 3:10–14 is death,<sup>47</sup> but he underestimates the damage that this does to the idea that the curse is corporate. Within the covenantal perspective of Deuteronomy, death is a curse that is experienced at the individual level (how could it be otherwise?), and it results from the individual's own sins. Thus, the best interpretation of Gal 3:10–14 is to view the curse as the individual covenantal curse of Deuteronomy, the curse of death. Given how Paul elsewhere refers to the Spirit in contexts discussing precisely the same set of issues, the reference to the Spirit here should not be taken to indicate that, against every other signal in the text, the curse in view is actually corporate.

### *Conclusion on the Corporate Curse View*

Upon close consideration, then, the evidence in favor of the view that Paul has in mind a corporate curse in Gal 3:10–14 proves quite slim. This proposal conflicts with the contextual meaning of Deut 27:26; there is very little evidence that the Jewish tradition interpreted the curse in Deut 27:26 corporately; the claim that the mixed nature of the citation points to a corporate curse asks too much of an alteration that makes good sense on other grounds; and the suggestion that Paul's reference to the Spirit in Gal 3:14 indicates that a corporate curse is in view pays too little attention to Paul's depiction of the issues in play as well as the similar contexts in which Paul refers to the Spirit in other letters. In the final estimation, then, despite the attractions of the corporate curse view, it does not appear to be the

110–22, McCaulley, *Sharing in the Son's Inheritance*, 118–24, who suggest that Paul mentions Lev 18:5 because there was a tradition of Jewish authors evoking this passage when discussing the exile.

<sup>45</sup> See the similar observations in Eckstein, *Verheißung und Gesetz*, 124; Waters, *End of Deuteronomy*, 96–97.

<sup>46</sup> Wright, *Climax of the Covenant*, 149.

<sup>47</sup> Morales, *Spirit and the Restoration*, 94–95, 106–9. Morales is similarly criticized by McCaulley, *Sharing in the Son's Inheritance*, 125, but McCaulley tries to resolve the problem in favor of the corporate curse by pointing out that resurrection was used as an image for Israel's restoration. The promise of "life" in Gal 3, however, is not metaphorical and national but literal and personal.



promised way through the interpretive wilderness but rather a tantalizing mirage; the evidence in its favor is attractive from a distance but leaves one wanting upon close examination.

## V. REVIVING THE ANTHROPOLOGICAL VIEW

We noted above four central critiques that critics suggest are fatal to the anthropological view, but can these objections be answered? Can the anthropological view be revived? In this section, I will suggest that the answer to these questions is yes, but, as with the resurrection body that Paul describes in 1 Cor 15, the revivification of this view will entail elements of continuity and discontinuity with what has come before.

First, let us consider the argument that the provision of means for atonement within the sacrificial system demonstrates that the law did not require perfect obedience. This point has been the most difficult for many advocates of the anthropological view to answer, and it does effectively critique some versions of this view. For those who claim that the law is a soteriological system within which any single infraction leads to definitive and permanent condemnation, the existence of the sacrificial system poses a major problem. Some advocates of the anthropological view have sought to evade this criticism by suggesting that Paul views the sacrificial system as obsolete since the coming of Christ.<sup>48</sup> This proposal does provide a logical answer to the criticism, but it falters at the level of exegesis. Paul's words in Gal 2:21 appear to imply that Christ's death does not merely provide a new form of the atonement that was already available in the law; it remedies a soteriological deficiency inherent in the Sinai covenant from its inception: "if righteousness were through the law, then Christ died needlessly."

Is the existence of the sacrificial system, then, a fatal critique for the anthropological view? By no means. Consider the argument of Stephen Westerholm: "The debate on this issue seems moot: since Paul claims that 'all' are 'under sin,' he presumably thought no human being would succeed no matter how low the passing grade of righteousness was set."<sup>49</sup> The conclusion of Westerholm's statement may be a bit hyperbolic, but he makes an important point. For the anthropological view of Gal 3:10 to work, the implied premise does not need to be that the law requires a sinless perfection that no one achieves; it needs to be only that no one can keep the law *sufficiently* in order to attain the life that it promises and avoid the curse

<sup>48</sup>Das, "Galatians 3:10," 214–16; Dumbrell, "Abraham and the Abrahamic Covenant," 23–25; Meyer, *End of the Law*, 155–57; Moo, *Galatians*, 204–5; Schreiner, *Galatians*, 205.

<sup>49</sup>Stephen Westerholm, *Perspectives Old and New on Paul: The "Lutheran" Paul and His Critics* (Grand Rapids: Eerdmans, 2004), 375 n. 66; cf. Watson, *Paul and the Hermeneutics*, 326, 525.

that it threatens. As we shall see, there is good evidence in Paul's letters that this is precisely what he thinks.

Before we turn directly to this evidence, however, we need to address the second objection—the claim that Paul could not have held the view that no one is able to fulfill the law because the Jewish Scriptures disagree with this view, particularly in passages that speak of specific people as righteous and in Deut 30:11–14. With respect to the passages that speak of specific people as righteous, presumably because of their obedience to the law, we simply do not know what Paul would have made of this material because he offers no comment on it in his letters. The assumption that he would have read it in the same way as those who lodge this objection is without evidence. Paul does, however, famously interact with Deut 30:11–14 in Rom 10:5–8. The specifics of this passage are highly disputed, but Paul clearly does not interpret Deut 30:11–14 as an affirmation that righteousness can be attained through obeying the law. Instead, Paul rewrites the passage as a testimony to Christ and contrasts it with Lev 18:5.<sup>50</sup> Thus, Paul's one interaction with a scriptural text that some understand to be teaching that the law is fulfillable suggests that he understood it quite differently.

The third objection, the suggestion that Paul's claim to have been “blameless according to righteousness in the law” in Phil 3:6, is perhaps the easiest to address. As many have pointed out, Paul's statement here is representative of a perspective to which he no longer adheres. Even a brief glance at Rom 7 demonstrates that Paul's understanding of his pre-Christian status shifted drastically at his conversion.<sup>51</sup>

Finally, we come to the objection that Paul never explicitly states that the law cannot be fulfilled. At the pedantic level, this claim is, of course, true. Nevertheless, the depiction of the encounter between a person under sin and the law in Rom 7:7–25 suggests that the law's promise of life remains unfulfilled because sin prevents even those who want to do what the law commands from obeying it sufficiently to attain this covenant blessing. As Paul succinctly states in the following chapter, “The mind that is set on the flesh is hostile to God; it does not submit to God's law, indeed it cannot; and those who are in the flesh cannot please God” (Rom 8:8–9 RSV). This is precisely what I have suggested Gal 3:10 implies.<sup>52</sup>

<sup>50</sup> Although some argue that Rom 10:5–8 presents Lev 18:5 and Deut 30:11–14 not as descriptions of contrasting kinds of righteousness but rather as coordinate pointers to the righteousness that Christians receive, three factors suggest the superiority of the contrastive reading: (1) the parallel with Paul's use of Lev 18:5 in Gal 3:10–14; (2) the use of precisely the same labels (“righteousness from the law/from faith”) by way of contrast in Phil 3:8–11; and (3) the presence of a description of the failure of the law's promise of life, echoing Lev 18:5, in Rom 7:7–12.

<sup>51</sup> See Gordon D. Fee, *Paul's Epistle to the Philippians*, NICNT (Grand Rapids: Eerdmans, 1995), 309–10; Kim, *Paul and the New Perspective*, 148–50; Marguerat, “L'évangile paulinien,” 51–54; Matlock, “Helping Paul's Argument,” 155–56; Waters, *End of Deuteronomy*, 99.

<sup>52</sup> See the similar arguments in Kim, *Paul and the New Perspective*, 141–43; Longenecker, *Triumph of Abraham's God*, 139–42.

Most decisively, however, the same human inability to obey the law sufficiently that Paul speaks of in Romans appears to be implied shortly before Gal 3:10; the final clause of Gal 2:16 reads, “by works of the law no flesh will be justified before you.” As many have noted, Paul’s wording here echoes Ps 143:2, where the psalmist pleads with God, “Do not enter into judgment with your servant, for no one living will be justified before you.” In the original context, the psalmist is asking that God not bring him to judgment because he knows that no living person could pass muster before the divine judge. In Gal 2:16, Paul makes two significant alterations to the psalm, both of which he repeats in a similar allusion to this text in Rom 3:20. First, he replaces the subject of “no one living” with “no flesh,” precisely the term that Paul invokes when he emphasizes humanity’s moral inability to obey the law elsewhere. Second, he adds the phrase “by works of the law” to the sentence, thereby including works of the law within the realm of deeds that one cannot sufficiently fulfill in order to receive a positive verdict in the divine courtroom.

This reading of Paul’s allusion is fairly common, but its significance for Gal 3:10 has rarely been noted.<sup>53</sup> The point that should be taken is that this allusion demolishes the final objection to the anthropological view. Paul implies that no one can keep the law sufficiently to be righteous before God in the very run-up to Gal 3:10–14. Unless Paul’s readers were very forgetful, this statement of human moral impotence in the face of the law would have been ringing in their ears when they came to Gal 3:10, and thus it is fully reasonable to expect that they would have intuitively supplied the premise that no one fulfills the law sufficiently between the two halves of the verse.<sup>54</sup>

It appears, then, that none of the objections to the anthropological view is insurmountable. When stated with sufficient care, the anthropological view makes excellent sense of Gal 3:10 and fits very well with the claims that Paul makes about humans and the law elsewhere in his letters.

<sup>53</sup> Even N. T. Wright summarizes Paul’s point about the law in this verse as “Nobody can keep it perfectly” (*Justification: God’s Plan and Paul’s Vision* [London: SPCK, 2009], 97). Although “perfect” obedience is probably not the issue, Wright here correctly concludes that the point is anthropological inability. For previous gestures toward the significance of this point for Gal 3:10, see Peter Oakes, “Law and Theology in Galatians,” in Tait and Oakes, *Torah in the New Testament*, 143–53, here 149; Frank Thielman, *Paul and the Law: A Contextual Approach* (Downers Grove, IL: IVP Academic, 1994), 124–25.

<sup>54</sup> Others have proposed that Gal 2:15–17 establishes that no one can fulfill the law because Gal 2:17 concludes that all belong to the circle of sinners (e.g., Bachmann, “Zur Argumentation von Gal 3.10–12,” 532–34, 537–38; Westerholm, *Perspectives Old and New*, 375). This view, however, depends on reading the phrase “found to be sinners” in Gal 2:17 as a true assessment, but it is more likely that this phrase refers to the judgment of law-observant Jews regarding Jewish Christians who have relaxed their observance of the law in some areas; see J. Andrew Cowan, “The Legal Significance of Christ’s Risen Life: Union with Christ and Justification in Galatians 2.17–20,” *JSNT* 40 (2018): 453–72, here 465–67.

## VI. CONCLUSION

In conclusion, despite its current popularity, the arguments in favor of the corporate curse view of Gal 3:10 appear to be problematic, particularly in what they suggest about Paul's interpretation of Deut 27:26. There is simply too little evidence in favor of the proposal that Paul or any other first-century interpreter read this text as a reference to a corporate curse on the nation of Israel. On the other hand, although some of the objections to the anthropological view of Gal 3:10 provide a corrective to particular articulations of this reading, none appears to be fatal. With a slight reconfiguration of the theory, the anthropological view can indeed be revived. Adjusting the implicit premise to the idea that no one can keep the law *sufficiently* to attain the blessing that it promises and avoid the curse that it threatens evades the most damaging criticism. Furthermore, this concept finds support in both the broader Pauline corpus and the near context in Galatians. Although I have been able to address only one alternative view in this essay, this corroborating evidence suggests that the case for the anthropological view remains quite strong and that all would-be usurpers face a formidable task in seeking to depose this interpretation.

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