

ABORTION AND NAZISM: IS THERE REALLY A CONNECTION?

John Hunt

SHE USED THE WORDS “shallow” and “disgraceful,” or words like these, as I recall, in describing William Brennan’s work, *The Abortion Holocaust*, in which he connects many of the actions and attitudes of those who believe in legalized abortion with many of the actions and attitudes of the Nazis.ⁱ She was the commentator on a panel devoted to reproductive policies at the Fall 1994 meeting of the New England Historical Association.ⁱⁱ

Right To Life groups certainly do make the connection between abortion and the Nazi Holocaust. Brennan’s work is the best known when it comes to making this connection. In the beginning of his book he compares abortion in the United States today to the killing of “postnatal discards” by the Nazis, that this linkage involves the “universality of the victimization process.”ⁱⁱⁱ

Brennan’s work came on the heels of many others who drew the same parallel. Let us observe just a few examples:

■ *The National Catholic Register* stated on May 13, 1979: “Six million is the number generally assigned not only to Jews who died under Hitler but to babies who have died under the Supreme Court.”^{iv}

■ A sign at a 1979 RTL convention read: “Auschwitz, Dachau, and Margaret Sanger, Three of a Kind.”^v

■ *The Abolitionist*, an anti-abortion newsletter published in Pittsburgh, stated: “We are not headed for a Holocaust. We are living in the very midst of one.”^{vi}

■ *The Wanderer*, a Roman Catholic periodical, has stated that there is no difference between the U. S. Supreme Court that legalized abortion and the Nazi civil service that carried out the final solution.”^{vii}

■ Terence Cooke, former Cardinal of New York, has stated: “Buchenwald, Dachau, Auschwitz—they say it would never happen here. But it has already happened. It is happening all around right now.” The Cardinal was referring to legalized abortion.^{viii}

■ C. Everett Koop, distinguished physician and former Surgeon General

of the United States, in 1977 came up with the slippery slope idea when he wrote: "...I see the progression from abortion to infanticide, to euthanasia, to the problems that developed in Nazi Germany.... I guess I favor the title: 'The Subtle, Slippery Slope to Auschwitz'."^{ix}

It is still William Brennan's work, *The Abortion Holocaust*, however, which makes the most thorough attempt to establish the connection between abortion and the Nazis. This paper has neither the time nor the space to analyze all of Brennan's arguments. What this paper will do, is to address itself to the specific criticisms made by those who say that there are no parallels between abortion and the Nazi Holocaust. It will then analyze these criticisms.

CRITICISM OF THE ABORTION-NAZI CONNECTION

We will analyze here the statements of five prominent organizations and three prominent individuals. These organizations and individuals have had an important influence in this country concerning the subjects of Nazism and/or abortion.

The National Organization of Women (NOW) has been in favor of legalized abortion since its founding in 1966. Perhaps because of its interest in many issues relating to women other than abortion, it is not interested in the very specific issue of abortion and a Nazi connection. NOW has no official position on the subject.^x

The Holocaust affected Jews more than anyone. Due to the percentage killed and the deliberate singling out of Jews by the Nazis, the Jews suffered more than anyone.^{xi} Yet, the Anti-Defamation League has told me concerning Nazism and abortion: "We have nothing on this."^{xii}

An organization that has pushed for legalized abortion since the death of its founder, Margaret Sanger, in the mid-1960^s is Planned Parenthood. When queried about a position concerning abortion and Nazis, an official of Planned Parenthood told me that they usually "do not dignify" with a statement, right-to-life charges of a connection.^{xiii} I took this answer to be like the positions of NOW and the Anti-Defamation League, i.e., no position. Later, the representative informed me that she was unable to locate anything written or specific about Planned Parenthood's position on abortion and the Holocaust.^{xiv}

I then turned to the American Civil Liberties Union (ACLU). This organization, along with NOW and Planned Parenthood, had pushed hard

since the mid-1960^s (especially in court) for legalized abortion. Yet, when it came to a refutation of any connection between legalized abortion and Nazism, the ACLU had no official position. A speaker for the group did inform me orally that the Nazis performed abortions for eugenic reasons, while the ACLU did not have this motive in pushing for legalized abortion.^{xv} The only other response to the subject was an article written by the former head of the ACLU, Aryeh Neier, in the *Civil Liberties Newsletter*, a publication by the ACLU in the 1960^s and 1970^s. Neier, a Jewish refugee from Nazism, claimed that anti-abortionists, not pro-abortionists, were closer to the Nazi position,^{xvi} a charge this paper will analyze.

These pro-legalization-of-abortion sources had no official position on the subject, although their unofficial positions are clear. Let us analyze four other pro-legalization forces that do take an official position on the subject.

We will begin with the National Abortion and Reproductive Rights Action League. This is the third name of this organization, but it has always used the acronym NARAL. Founded in 1969 by Betty Friedan, Lawrence Lader, Bernard Nathanson and others, the purpose of the organization was to make abortion legal and keep it legal. Unlike NOW, whose interests in women go far beyond the issue of abortion, NARAL has concentrated solely on this issue and, as a result, has had much influence. It is perhaps only natural that they would have a position on our question under discussion. The NARAL position is this:

Hitler used racial grounds to exterminate Jews and other "undesirables." The reproductive rights movement has no genocide component—no one is out to kill all embryos. It is an insult to the memory of the alive and conscious human beings murdered by the Nazis to equate them with embryos for anti-abortion propaganda.^{xvii}

A careful reading here can discern two points: (1) legalized abortion is not genocide; and (2) the unborn are not (it is implied) human.

NARAL also maintains that Nazism was anti-abortion, and thus implies that those who are anti-abortion today are the ones closer to Nazism.^{xviii} So they also make a third argument, that of anti-choice.

Gloria Steinem, a leading feminist, founder of *Ms* magazine, and author, makes the same three arguments in an essay written in 1980, but not published until 1983; the same year as the NARAL position was adopted.

The essay is entitled: “If Hitler Were Alive, Whose Side Would He Be On?,” and became an unnumbered chapter in her 1983 book *Outrageous Acts and Everyday Rebellions*.^{xix}

Specifically, Steinem here points out that Afro-Americans have a higher abortion rate than whites because of lack of access to good health care and contraception.^{xx} Legalized abortion is not genocide as is often charged.

She makes much of Hitler’s demanding the subordination of the individual to the Nazi state and how this hurt the feminists in Germany. Her emphasis here is on born females, and she does not address herself to the unborn.^{xxi} The implication here, as in the NARAL position, is that the unborn are not worth counting.

Finally, Steinem mentions the sterilizations and forced abortions carried out by the Nazis, but condemns them only because they were involuntary. Here we have that third argument, i.e., the Nazis were against choice.^{xxii}

Whereas NARAL mentioned Nazi anti-abortion policies as being against choice, Steinem emphasizes forced abortions as being against choice. This is a critical distinction and will be explained more later; *it involves a discussion of the nature of abortion itself, that is, why the Nazis forbade it to one group but forced it on others*. Steinem uses phrases such as “anti-equality groups,” “authoritarianism,” and “right-wing” throughout the chapter to describe groups that are anti-individualistic, racist, sexist, and afraid of change. To her, pro-life people fit here and are thus closer to Nazis than are pro-choice people.^{xxiii}

We turn now to Ellen Goodman, author and influential syndicated newspaper columnist. In one of her columns she echoes two of the three arguments put forth by NARAL and Steinem. Agreeing with Argument #2 of NARAL and Steinem—the implication that the unborn are something less than human—she states: “Anti-abortion groups talk about the abortion-holocaust—comparing fetuses to Jews and the doctors [who do the abortions] to Joseph Mengele.”^{xxiv}

Again, like NARAL and Steinem, but particularly like NARAL, she invokes Argument #3, that of choice: “As far as pinning the Nazi label on the supporters of abortion rights, the propagandists surely know that Hitler was a hard-line opponent of abortion. (Did that make him pro-life?). Tell the ditto-heads [right-to-lifers] that feminists were a prime target of the Nazis.”^{xxv}

Finally, we must explore the work of Professor Robert Weisbord. Professor Weisbord is not as well known as the groups and people

mentioned so far. Weisbord, however, who is a history professor at the University of Rhode Island, teaches a course on the Holocaust, and has written four books and thirty articles on Jewish and Black history. He represents, therefore, a good bit of pro-choice thought in academia, especially our topic under discussion.

Weisbord's arguments are contained in an article entitled: "Legalized Abortion and the Holocaust: An Insulting Parallel," which he wrote for a Jewish publication. His arguments concern questions of the unborn's humanity (#2), and the argument about choice (#3). Here he is like Ellen Goodman. Let us deal here with his choice argument first. Like NARAL, Steinem, and Goodman, Weisbord stresses the anti-choice elements in Nazi abortion thinking. NARAL and Goodman, you might recall, stressed Nazi anti-abortion policies as being against choice, while Steinem emphasized forced abortions as being against choice. In this matter, Weisbord stresses both when he says: "Thus the Nazis followed a coercive pro-natalist policy for fellow Germans and a coercive anti-natalist policy for vanquished peoples. Denial of reproductive freedom, the absence of truly free choice, and disregard for women's rights were the common elements."^{xxvi}

Weisbord, more than anyone else, focuses attention on the nature of abortion itself, by focusing on the question of why the Nazis forbade it to healthy Germans but forced it on unhealthy Germans and non-Germans. This is the second time we raise this question in this paper. Weisbord condemns both (those who forbid and those who force abortion). He implies that if a woman wants an abortion she should be allowed to have one, and that if she does not want one, she should not have it imposed on her. The whole focus is on the born woman and her choice, and not the unborn life involved.

This brings us to his statements about unborn life (#2). NARAL, Steinem, and Goodman only imply that a fetus is not fully human; Weisbord comes right out and says that it definitely is not:

We must never forget who the principal targets of the Nazis were... men, women and children, each possessing his or her own name, identity and personality. They were living, human beings. How can any reasonable person liken them to the fetuses destroyed when unwanted pregnancies are terminated? The fetuses in question do not exist independently of their mothers in whose wombs they are nourished and nurtured.... The destruction of a fertilized egg, we are told, is the moral equivalent of gassing or shooting a human being because he is a Jew.

Surely, to equate the two is to trivialize the tragedy of the Holocaust.... The equation of legalized abortion and the Holocaust... is more than deceitful. It is insulting to the memory of the six million who perished in the nightmare of Nazism.^{xxvii}

Weisbord's article contains a picture of a Jew just before being shot by a Nazi, and this is juxtaposed against a picture of a six week old fetus. There is a caption stating that the two can hardly be equated.^{xxviii}

Hence, to Weisbord, the unborn are not human (#2), and thus the choice (#3) of whether or not to terminate a pregnancy should be left to the born woman. In the beginning of his article, which I will use here to summarize, he states: "In their zeal to buttress their case, anti-abortionists often show symptoms of that age-old malady, selective historical amnesia."^{xxix}

AN ANALYSIS OF THE CRITICISMS

To repeat, the criticisms of those who say there is no connection between Nazism and abortion can be boiled down to three points:

- (1) Legalized abortion is *not genocide*—this is the view of NARAL and the unofficial view of the ACLU.
- (2) The unborn are *not human*—this is implied by NARAL, Steinem, Goodman, but stated openly by Weisbord.
- (3) The Nazis, like pro-lifers, were *against choice*—all four of those with officially stated positions (NARAL, Steinem, Goodman, Weisbord) make this point, while at least three other organizations (NOW, Planned Parenthood, ACLU) would no doubt agree, even though they have not made official statements.

Let us analyze each of these three points.

(1) Legalized abortion is *not genocide*—the dictionary defines "genocide" this way: "the deliberate and systematic extermination of national, racial, political, or cultural group."^{xxx} Another definition comes from Raphael Lemkin in his book, *Axis Rule in Europe*, published in 1944. Lemkin is the one who actually coined the term "genocide." He states that genocide is "the coordinated and planned annihilation of a national, religious, or racial group by a variety of actions aimed at undermining the foundations essential to the survival of the group as a group."^{xxxi}

These two definitions would seem to back the NARAL and ACLU

criticisms. According to the two, genocide must be “systematic” or “planned,” in other words, deliberate. In addition, the deliberate killing must be aimed at a specific racial, religious, national, political, or cultural group. Since legalized abortion cuts across racial, religious, national, political, and cultural (even gender and class) lines, no one group is deliberately singled out, hence no genocide is involved.

I would like to fine-tune this definition. On December 11, 1946, the United Nations General Assembly passed this resolution concerning genocide: “Genocide is the denial of the right of existence to *entire human groups* [emphasis mine]... Many instances of such crimes of genocide have occurred, when racial, religious, political and *other groups* [emphasis mine] have been destroyed, entirely or in part.”^{xxxii} “Entire human groups... destroyed... in part” can mean the unborn: those killed for reasons of age, size, stage of development, and temporary place of residence. A law legalizing abortion victimizes an identifiable group of human beings who are just at the start of life’s continuum. Even though most unborn are not aborted, the abortion laws in the United States and most western countries *deliberately classify the unborn, as a group*, as being vulnerable to abortion. These laws fit, I believe, into the United Nation’s definition of genocide. We must remember that those guilty of genocide do not necessarily kill all members of a given group.

In 1948, the United Nations elaborated on this 1946 resolution with its Convention on the Prevention and Punishment of the Crime of Genocide. Article II condemns as genocide the “imposing of measures intended to prevent births within the [targeted] group.”^{xxxiii} For many of the born, laws legalizing abortion seem to allow choice; for the unborn, however, those laws certainly are impositions.

Finally, with regard to the matter of genocide and its connection specifically to Nazism, *is it not strange that, with all of the things associated with the Nazis, and condemned by the Nuremberg Trials after World War II, abortion was one of them?* In the RuSHA, or Greifelt Case, the Tribunals condemned Nazi activity in the eastern part of Europe, activities that included murder, deportations, expropriation, enslavement, torture, the kidnapping of children, forced Germanization of enemy nationals, special persecution of the Jews, and abortion.^{xxxiv} The prosecutor, in his summation at the RuSHA Trial, stated that abortion, voluntary or forced, was “an act of extermination,” and “ill-treatment of a civilian population.”^{xxxv} *Thus, abortions were used as one of the means of*

the Nazi genocide. There is a connection between abortion, in general, and the Nazi Holocaust, in particular, in the matter of genocide.

(3) The Nazis, like pro-lifers, were *against choice*—let us consider this argument before #2. If the unborn are not human, then what the Nazis did was wrong because it was forced or pressured, and because they systematically applied it just to certain groups. The Nazis, in other words, would have violated the born in the matter of abortion. We can deal with this briefly by asking: *Is it not strange, that what many today see as a woman's liberty, Nazis saw as a very useful and efficient means of killing?* Who is right? The question brings us back to the second (and final) argument.

(2) The unborn are not *human*—it is a biological fact that human life is a continuum. It is true that the unborn, as distinct from the born, are very small, young, out of sight, and very dependent on the born. However, to dehumanize the unborn on the basis of size, age, temporary place of residence, and need—all relative things—is to open up a Pandora's Box that could rebound badly on the born.

Consider a child in an incubator. He or she is very small, very young, almost out of sight, and highly dependent on others. To kill that child on the basis of its size, age, temporary place of residence, or need would be a great evil. Is there that much difference between the child in the incubator and the child in the incubator of his mother's womb?

There are some who would confuse "*being*" with "*functioning*." If an individual cannot function because he or she is in a coma (a disorder), that individual is still a person. If an individual cannot function because he or she has not fully developed (a child, in or out of the womb), that individual is also a person. *Both are human beings* with the potential to function as a person. In other words, the being in the coma once did function, but does not now, while the born or unborn child does not now function, but in time will. There is not that much difference. The being of each, a continuum, takes precedence over the functioning of each. If we declare as persons (and thus grant to the declaree the protection of the law) only those who can function, we open, to repeat, a Pandora's Box of possibilities. There would be great conflict as to what constituted adequate function, and even greater conflict as to who would set the standards.^{xxxvi}

History is replete with examples of legal dehumanization and depersonalization: the enslavement of Afro-Americans to help the

American economy, the almost-annihilation of Native Americans in the push westward (Manifest Destiny), the low status of women and children throughout most of history because of patriarchy, the victims of the Holocaust due to visions of racial superiority, and abortion of the unborn because of convenience, to name just a few. In all of these cases dehumanizers offered no scientific evidence whatsoever to justify what they were doing. These dehumanized and depersonalized groups, at one time or place or another, were either treated as objects and used, or seen as obstacles and annihilated. Yet today, Western society recognizes the humanity and personhood of all but the last, having withdrawn legal protection during the 1960^s and 1970^s, after roughly a century of protection (it is ironic to note that the law protected unborn children before born children).

Don Feder, a Jewish syndicated columnist, has had this to say about our subject under discussion: “Jewish abortion advocates cringe at the equation of slaughter of the unborn and the Holocaust. Yet Rabbi Jakobovits [the outgoing Chief Rabbi of the United Kingdom in 1991], himself a refugee from Nazi Germany, declares: ‘Jews may be particularly sensitive to any such discrimination (determining which life is worthy of preservation), having witnessed the horror of six million being shoved into the gas chambers because they were deemed inferior [non-human].’”^{xxxvii}

We must constantly remind ourselves of the Nuremberg Trials, and in the 1947-1948 RuSHA Trial, the prosecutor, in his summation, admitted that Section 218 of the German Empire’s Penal Code had been amended by Weimar (1918-1933) and the Nazis (1933-1945), and that these regimes were legal. Nevertheless, the prosecutor still maintained that the Weimar democracy’s liberalizing of abortion for women’s reproductive liberty, and Hitler’s legalizing of abortion for racial reasons, were laws that should not have been passed. He described Nazi use of abortion as “an inhumane act,” and ended by saying that even if a woman had an abortion voluntarily, “it constituted a war crime and a crime against *humanity* [emphasis mine].”^{xxxviii} The Tribunal, in its decision, found that “encouraging,” as well as “compelling,” abortion constituted war crimes and crimes against humanity.^{xxxix} *If the Nuremberg Trials are wrong about this, what else were they wrong about?*

Thirty years after World War II, West Germany legalized abortion on demand for the first trimester of pregnancy. On February 25, 1975, the Federal Constitutional Court of that country (*Bundesverfassungsgericht*)

struck the law down as being unconstitutional. In its decision, it said that life was a continuum and that unborn life was to be respected in principle with born life.^{xl} It stated that “abortion is an act of killing that the law is obligated to condemn,” and that the “bitter experience” with Nazism had led the Court to value life highly.^{xli} The beginning of the decision showed the connection between abortion and Nazism this way:

Article 2 II 1 of the Constitution protects life being developed in the mother’s womb as an independent legal entity. The express inclusion of the right to life in the Constitution... in contrast, for example, to the Weimar Constitution, is to be explained primarily as a reaction to the “destruction of life that is not worthy of living,” to the “final solution” and to ‘liquidations’ carried out by the National Socialist [Nazi] regime as governmental measures. Article 2 II 1 of the Constitution contains, in addition to the abolition of the death penalty in Article 102, “a profession of commitment to the fundamental value of human life and to a concept of the state that places it in decisive opposition to the views of a political regime to which an individual life meant little and which for this reason engaged in unlimited abuse of the right it had usurped over the life and death of the citizen.”^{xlii}

The German High Court repeated this connection at the very end of its decision:

The basic laws that underlie the state’s foundation can be explained only by understanding the historical experience and spiritual-moral explanation of the previous system of National Socialism [Nazism]. Against the omnipotence of the totalitarian state, the boundless power over all aspects of social life claimed for themselves, and with the pursuit of its national goal that the basic life of the individual meant nothing, [Nazism] established as the basic law the principal of order, which subordinated the individual and his dignity to its control. There exists, as the court has already declared... the basic case, that humankind possesses a uniquely independent value of which there is absolute concern for the life of *every single individual* [emphasis mine], which also aids irrevocably the *apparently social “valueless”* [emphasis mine], and which, for this reason, excludes exterminating *any life* [emphasis mine] without justified reason. This basic clarification by the court determines the making and interpretation of the entire legal code. Likewise, the lawmaker not in agreement is not free; politically correct considerations of expediency, even state political necessities, could not prevail over these constitutional limits.^{xliii}

In other words, the Nazis had no respect for human life, and to insure human life’s protection for the future, we have to respect all human life,

including life in the womb. Put yet another way, if, as a society, we do not respect pre-natal life, we will not respect post-natal life, and we will be thinking like the Nazis (those against the death penalty always are stating how capital punishment erodes respect for life, even among the decent). If we say that the German High Court is wrong here, cannot someone also say that the U. S. High Court was wrong with *Roe v. Wade* in 1973? The German High Court's decision, however, must be given much weight, given their awareness of what took place under Nazism in that country.^{xliv}

Is there a connection between abortion and Nazism? The answer is yes. Let us summarize by looking, for the last time, at the arguments of those who say no, arguments that maintain: there is *no genocide*, there is *no human* involved, there should be a *choice*.

(1) The Nazis used abortion as one of the means of their *genocide* during World War II, and this was specifically condemned at the Nuremberg Trials in 1948 when the Nuremberg prosecution described abortion, voluntary or forced, as an "act of extermination" and "ill-treatment of a civilian population." Abortion also fits the definition of the United Nations' definition of genocide, formulated between 1946 and 1948, in reaction to the Nazi experience.

(2) The prosecutor at the RuSHA trial of Nazis at Nuremberg made no distinction between voluntary and forced abortion in declaring abortion a war crime and crime against *humanity*, and the Tribunal stated that encouraging as well as compelling abortion were war crimes and crimes against *humanity*. The German Supreme Court's decision in 1975, in striking down a law legalizing abortion, stated very clearly, that if we do not respect unborn life equally with born life, we will be thinking like Nazis.

(3) Since abortion in general is genocide, and was specifically used as a tool of genocide by the Nazis, and since life in the womb is human, there can be no question about *choice*.

Will concerns about class, race, gender, and sexual orientation have to make room (again) for concerns about age and size in order to preserve respect for life in our society? We will end here with the words of Elie Weisel, a Jewish prisoner of Auschwitz (where he lost his whole family), whose novels, plays, and speeches have kept alive the memory of the Holocaust, and which won him the Nobel Prize in 1986. He has said: "I really have not given the issue [of abortion] enough thought."^{xlv}

NOTES

-
- i. William Brennan, *The Abortion Holocaust: Today's Final Solution* (St. Louis: Landmark Press 1983). A more recent work touching on this subject by the author is *Dehumanizing The Vulnerable: When Word Games Take Lives* (Chicago: Loyola University Press 1995).
 - ii. The Fall meeting of The New England Historical Association, University of Hartford, West Hartford, Connecticut, October 22, 1994. I was on the panel and gave a paper entitled: "A Tale of Two Countries: American and German Attitudes to Abortion Since World War II."
 - iii. Brennan (1983) 3-4.
 - iv. Gloria Steinem, *Outrageous Acts and Everyday Rebellions* (New York: Holt, Rinehart, and Winston 1983) 305.
 - v. Ibid.
 - vi. Steinem 306.
 - vii. Robert G. Weisbord, "Legalized Abortion and the Holocaust: An Insulting Parallel" in *The Jewish Veteran* (Jan.-Mar. 1982) 12.
 - viii. Ibid.
 - ix. C. Everett Koop, "The Slide to Auschwitz" in *The Human Life Review* 3/2 (Spring 1977) 112.
 - x. Telephone conversation with Connecticut and national offices of the National Organization of Women, May 3, 1995.
 - xi. Stephen T. Katz, "The Distinctiveness of the Holocaust." Talk given before the 14th Annual Conference on the Holocaust, Millersville University, Millersville, Pennsylvania, April 10, 1995. The speaker was an official of the Holocaust Memorial Museum in Washington, D. C.
 - xii. Telephone conversation with the Anti-Defamation League, New Haven, Connecticut, June 23, 1995. The woman who spoke appeared tense and angry with the question.
 - xiii. Telephone conversation with Susan Yolan, Director of Public Affairs and Communications for Planned Parenthood of Connecticut, June 14, 1995.
 - xiv. Letter from Susan Yolan, Director of Public Affairs and Communications for Planned Parenthood of Connecticut, to the author, June 23, 1995.
 - xv. Telephone conversation with Cheryl Cohen, Reproductive Freedom Project, American Civil Liberties Union, New York City, June 14, 1995. See also: Letter from Dr. Alan Weston to the author, June 29, 1995. The ACLU directed me to write to

Dr. Weston, an ACLU member and one most knowledgeable on the subject.

xvi. I am recalling this from memory. The article was written in the late 1960s or early 1970s. The only place in Connecticut where the *Newsletter* was located was at the University of Connecticut at Storrs, Connecticut. Their collection was very spotty and did not contain the article.

xvii. Letter from Laurel Tiesinga, MSW, Executive Director of Connecticut NARAL, to the author, May 22, 1995. The position stated in this letter is #45 of 54 points in a point/counterpoint (anti-choice/pro-choice) format, prepared by Polly Rothstein and Marian Williams, Westchester [NY] Coalition for Legal Abortion, and printed, with permission, by the NARAL Foundation, Washington, D. C., 1983. Cited hereafter as NARAL Document.

xviii. NARAL Document, #46.

xix. Steinem (cited in n. 4 above) 305-06.

xx. Steinem 307.

xxi. Steinem 309-310.

xxii. Steinem 311, 313-314.

xxiii. Steinem's ideas in her 1983 book about authoritarianism, patriarchy, and anti-feminism in the United States and Germany are reflected again later, in shorter form, and with an emphasis on born children, in *Revolution from Within: A Book of Self-Esteem* (Boston: Little, Brown and Company 1992) 74-77.

xxiv. Ellen Goodman, "Reserve Words About Nazis for the Reich" in *The Hartford Courant* (June 6, 1995) A 9.

xxv. *Ibid.*

xxvi. Weisbord 13.

xxvii. *Ibid.* Weisbord concentrates on the Jews, but an equal number of non-Jews perished in the same death camps.

xxviii. *Ibid.*

xxix. Weisbord 12.

xxx. *Webster's College Dictionary* (New York: Random House 1991) 557.

xxxi. David E. Stannard, *American Holocaust: The Conquest of The New World* (New York: Oxford University Press 1992) 279.

xxxii. Stannard 279-80.

xxxiii. Stannard 280.

xxxiv. *Trials of War Criminals Before the Nuernberg Military Tribunals, October, 1946 - April, 1949*, Vols. IV-V, "The RuSHA Case" (Washington, D. C.: U. S. Government Printing Office 1949) IV, 609-617. Cited hereafter as *TWC*.

xxxv. *TWC* 685-86. Records of the United States Nuernberg War Crimes Trials,

United States of America v. Ulrich Greifelt, et al. (Case VIII), October 10, 1947- March 10, 1948 in the National Archives, Washington, D. C., Microfilm Publication 894, Roll 31 (Trial Vols. 12 and 13) pp. 13-14. See also pp. 37-42. Cited hereafter as *NWCT*. The RuSHA (Greifelt) Case covers some 5400 pages of testimony of which about 800 pages have been published in Volumes IV and V of *TWC*.

xxxvi. These ideas are more fully developed by Stephen Schwarz, *The Moral Question of Abortion* (Chicago: Loyola Univ. Press 1990) 12-19. In Chapter 7, Schwarz argues forcefully for the personhood of the unborn.

xxxvii. Don Feder, "Abortion, Judaism, and Jews" in *National Review* 43/12 (July 8, 1991) 37.

xxxviii. *NWCT* M 894, R 31, pp. 13-14. See also pp. 37-42.

xxxix. *TWC* V, 153, 160-161, 166. See also IV, 610, 613.

xl. Donald D. Kommers, "Abortion and the Constitution: The Cases of the United States and West Germany" in *Abortion: New Directions For Policy Studies*, eds. Edward Manier, William Liv, and David Solomon (Notre Dame: Univ. of Notre Dame Press 1977) 94-95.

xli. Kommers 97-98.

xlii. Translated by Dr. O. J. Brown in *The Human Life Review* 1/3 (Summer, 1975) 77-78.

xliii. *Neues Juristisches Wochenblatt*, 1975, XIII, 582. Kommers and Brown, cited in notes 40 to 42 above, do not have this translated. This is my own translation.

xliv. As late as 1993, the German High Court at Karlsruhe reaffirmed this 1975 decision. In two of its seventeen basic principles it stated: (1) The Basic Law [the German Constitution] mandates the state to protect humankind, including unborn children. This protection has its basis in Article 1, Section 1 of the Basic Law; it is more clearly spelled out in Article 2, Section 2 of the Basic Law. The unborn already have human dignity. The proper approach for the law must be to accept the unique right to life during the unborn's development. This right to life is not established simply by its acceptance by the mother. (4) The abortion must be viewed as being basically wrong for the entire length of the pregnancy and accordingly be forbidden (Confirmation, Federal Constitutional Court, 39, 1 [44] = Basic European Laws, 1975, 126 [140]. The right to life of the unborn should not, if only for a limited time, be in the hands of a third party, even if it be of the mother. See *Europäische Grundrechte Zeitschrift* (June 4, 1993) IX-X, 229.

xlv. Elie Weisel and John Joseph O'Connor, *A Journey of Faith* (New York: Dr. Fine 1990) 78.