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Cursed by God? Galatians 3:13, Social Status, and Atonement Theory in the Context of Early Jewish Readings of Deuteronomy 21:23

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Paul's citation of Deut 21:23 in Gal 3:13 is often misunderstood, as Paul is frequently thought to be declaring that Jesus, by virtue of his crucifixion, fell under the curse which Deut 21:23 pronounces on victims of that form of execution. This, it is claimed, was the mechanism by which Jesus atoned for sin, as God transferred the curse resting on humans to Jesus, who bore it vicariously. There is no evidence, however, that Second Temple Jews read Deut 21 as cursing all crucifixion victims. Rather, a wealth of evidence suggests that they understood the Law to curse only those crucified victims who were truly guilty of capital offenses against God. Therefore, there is good reason to believe that Paul, himself a Second Temple Jew convinced of Jesus's innocence, did not believe that Jesus was cursed by God solely by virtue of his manner of death on a cross. Thus, Paul's language in Gal 3:13 when he speaks of Christ "becoming a curse" rather than becoming "accursed" is significant. It refers to Jesus's humiliation and execration at the hands of his fellow Jews, not his becoming vicariously cursed by God. It is thus not an explanation of the mechanism by which Christ achieved atonement. This reading receives virtually unanimous support from Patristic interpretations.

Key Words: Galatians, Deuteronomy, curse, crucifixion, cross, Law, redemption, atonement, patristics, church fathers

INTRODUCTION

In Gal 3:13, Paul announces that "Christ redeemed us from the curse of the Law, having become a curse for us." He then cites Deut 21:23, which pronounces a curse on the crucified victim. Scholarship on this passage, a



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notorious exegetical crux in Pauline studies, is voluminous.¹ Discussion of the passage, however, has for too long labored under the weight of illegitimate assumptions about how Paul is using this text from Deuteronomy as well as how he understands Jesus's cursed death. In the following, I argue five key propositions: (1) Deut 21 does not lay a curse on all victims of crucifixion simply by virtue of the manner in which they were executed. (2) There is no evidence that Second Temple Jews read Deut 21 as cursing all crucifixion victims. Indeed, a wealth of evidence suggests otherwise. (3) Paul, himself a Second Temple Jew, is no exception to this. He does not believe that Jesus was cursed by God solely by virtue of his manner of death on a cross. (4) Paul's language when he speaks of Christ "becoming a curse"

1. For example, see Todd A. Wilson, *The Curse of the Law and the Crisis in Galatia: Reassessing the Purpose of Galatians*, WUNT 2/225 (Tübingen: Mohr Siebeck, 2007); P. C. Onwuka, *The Law, Redemption and Freedom in Christ: An Exegetical-Theological Study of Galatians 3,10-14 and Romans 7,1-6* (Rome: Editrice Pontificia Università Gregoriana, 2007); 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); R. Barry Matlock, "Helping Paul's Argument Work? The Curse of 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; Kjell Arne Morland, *The Rhetoric of Curse in Galatians: Paul Confronts Another Gospel* (Atlanta: Scholars Press, 1995); M. Silva, "Abraham, Faith, and Works: Paul's Use of Scripture in Galatians 3:6-14," *WTJ* 63 (2001): 251-67; B. S. Davis, *Christ as Devotio: The Argument of Galatians 3:1-14* (New York: University Press of America, 2002); A. Damascelli, "Croce, maledizione e redenzione: Un'eco di Purim in Galati 3,13," *Hen* 23 (2001): 227-41; W. Reinbold, "Gal 3,6-14 und das Problem der Erfüllbarkeit des Gesetzes bei Paulus," *ZNW* 91 (2000): 91-106; F. Manzi, "L'annullamento della maledizione Di Dt. 21,23 in Galati e nel Dialogo con Trifone," *Aug* 42 (2002): 5-34; A. Caneday, "Redeemed from the Curse of the Law": The Use of Deut 21:22-23 in Gal 3:13," *TrinJ* 10 (1989): 185-209; Don Garlington, "Role Reversal and Paul's Use of Scripture in Galatians 3.10-13," *JSNT* 65 (1997): 85-121; R. G. Hamerton-Kelly, "Sacred Violence and the Curse of the Law (Galatians 3.13): The Death of Christ as a Sacrificial Travesty," *NTS* 36 (1990): 98-118; D. Brondos, "The Cross and the Curse: Galatians 3.13 and Paul's Doctrine of Redemption," *JSNT* 81 (2001): 3-32; K. S. O'Brien, "The Curse of the Law (Galatians 3.13): Crucifixion, Persecution, and Deuteronomy 21.22-23," *JSNT* 29 (2006): 55-76; T. L. Donaldson, "The 'Curse of the Law' and the Inclusion of the Gentiles: Galatians 3.13-14," *NTS* 32 (1986): 94-112; N. Bonneau, "The Logic of Paul's Argument on the Curse of the Law in Galatians 3:10-14," *NovT* 39 (1997): 60-80; R. J. Morales, *The Spirit and the Restoration of Israel: New Exodus and New Creation Motifs in Galatians*, WUNT 2/282 (Tübingen: Mohr Siebeck, 2010); T. 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; R. 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; C.D. Stanley, "'Under a Curse': A Fresh Reading of Galatians 3.10-14," *NTS* 36 (1990): 481-511; D. Sängler, "'Verflucht ist Jeder, wer am Holze hängt' (Gal 3,13b): Zur Rezeption einer frühen antichristlichen Polemik," *ZNW* 85 (1994): 279-85; N. H. Young, "Who's Cursed—and Why? (Galatians 3:10-14)," *JBL* 117 (1998): 79-92; J. D. G. Dunn, "Works of the Law and the Curse of the Law (Galatians 3.10-14)," *NTS* 31 (1985): 523-42.

rather than becoming “accursed” is significant. It refers to Christ’s humiliation and execration at the hands of his fellow Jews, not his becoming vicariously cursed by God. It is thus not an explanation of the mechanism by which Christ achieved atonement. (5) Patristic interpretations, which can help us check our modern assumptions, are virtually unanimous in supporting this reading of Gal 3:13.

DOMINANT READINGS OF GALATIANS 3:13

To set the stage, it will be helpful to outline briefly three common ways of reading Gal 3:10–14. The following summaries will necessarily paint with a broad brush. There are, of course, numerous variations and nuances within each interpretive approach.

Traditional (Reformed/Lutheran) Readings

For most of the past three centuries, modern biblical scholarship, largely dominated by Protestants, has agreed on the basic meaning of the passage.² On this view, Gal 3:10–14 discusses the fearful and universal plight of human beings:³ God’s law requires sinless perfection, but no one is sinless. Therefore, the law cannot justify, and Christ’s atoning death is necessary for salvation. In his death, God transfers humanity’s sin to Jesus, and Jesus bears the curse of sin and the wrath of God on behalf of humanity.⁴ The language used to describe the atonement varies. Although Paul uses the language of “curse,” interpreters often paraphrase this using (sometimes mixing) legal or economic metaphors (e.g., “penalty” or “debt”). It is always assumed, however, that Gal 3:13 describes the *mechanism* of the atonement. That is, it explains *how* Christ’s death can bring about redemption for its beneficiaries: namely, Christ removes the curse of the law from humans and takes it on himself.

2. For representatives of this viewpoint, broadly understood, see most recently Douglas J. Moo, *Galatians* (Grand Rapids: Baker, 2013), 201–13; Thomas R. Schreiner, *Galatians* (Grand Rapids: Zondervan, 2010).

3. That is, the “we/us” in 3:13 is understood to be inclusive, referring to Paul and his readers as representative of humanity. Cf. Heinrich Schlier, *Der Brief an die Galater*, 6th ed., KEK 7 (Göttingen: Vandenhoeck & Ruprecht, 1989), 136–37. Moo, *Galatians*, 203, acknowledges Paul’s Israelite focus, as well as his salvation-historical argument, but nevertheless holds that Paul is here “concerned with what is in many ways the more fundamental issue of ‘doing.’” According to Moo, “the law provides no basis for the blessing because it involves ‘doing’: a ‘doing’ that humans find to be impossible” (p. 204). Thus, Paul is stating here “a fundamental and universally valid principle about the exclusive value of believing versus doing,” a principle the Reformers were “entirely justified” in propounding (p. 210).

4. Moo, *Galatians*, 213.

New Perspective Readings

Over the past 30 years, traditional readings of Paul and the Law have been vigorously challenged by proponents of the “New Perspective on Paul.”⁵ The New Perspective is far from monolithic, but it generally advocates a reading of Paul within Second Temple Judaism and, especially, Jewish covenantal categories. Paul is seen to be interacting with the scriptural narrative of sin, exile, and restoration. On this view, Paul’s focus in many passages is more on the Mosaic Law and covenant and more on the specific plight of Israel as a nation than on the universal plight of humans. The Mosaic Law is not impossible to fulfill, nor does it require perfect obedience. Indeed, it comes with a built-in means whereby individuals may atone for sin through repentance and sacrifice. As a nation, however, Israel has committed apostasy from the covenant and has thus incurred the Law’s curse. The curse of the law, then, is not primarily individual but national. For Paul, it is a historical fact that Israel has come under the curse of the Law in that Israel is presently scattered and under foreign domination.⁶ Gentiles, of course, were never part of this covenant. They were not “under the law” (ὕπὸ νόμου), nor were they subject to the deuteronomic curses or blessings to which Paul alludes.⁷ To be sure, Gentiles have their own problems, but breaking a covenant they were never part of is not one of them.⁸

On the New Perspective reading, then, Gal 3 deals with Israel’s plight. Paul’s point in Gal 3:13 is correspondingly specific to Israel: Christ redeemed *us* from the curse of the Mosaic Law that *we* had incurred by national apostasy, just as Deut 28–30 had warned. The first-person pronouns are rather important, as they refer to Paul and his fellow Jewish believers in

5. For the main proponents of the New Perspective, see J. D. G. Dunn, *The New Perspective on Paul* (Grand Rapids: Eerdmans 2008); E. P. Sanders, *Paul, the Law, and the Jewish People* (Philadelphia: Fortress, 1983); N. T. Wright, *Paul: In Fresh Perspective* (Minneapolis: Fortress, 2005); N. T. Wright, *Paul and the Faithfulness of God* (Minneapolis: Fortress, 2013).

6. N. T. Wright, *The Climax of the Covenant: Christ and the Law in Pauline Theology* (Minneapolis: Fortress, 1992), 141–48; Terence L. Donaldson, *Paul and the Gentiles: Remapping the Apostle’s Convictional World* (Minneapolis: Fortress, 1997), 180; Morales, “Words of the Luminaries,” 275; Frank J. Matera, *Galatians*, SP 9 (Collegeville, MN: Liturgical Press, 1992), 120.

7. See the language of blessing/cursing in Gal 3:9, 10, 13, 14.

8. See Wright, *Paul and the Faithfulness*, 865. In recent years, the traditional Reformed or Lutheran approach has taken note of the force of the New Perspective’s reading in this regard. Thus, most traditional commentators now acknowledge that Paul is dealing with Israel’s history and has in view the Mosaic Law, not an abstract moral law. Nevertheless they continue to insist that in some sense Gentiles are under the curse of the law, and thus that the plight Paul describes is universal and not limited to Israel. See, e.g. Moo, *Galatians*, 213: Paul “implies that Gentiles somehow share in the condition of Jews under the law,” that is, “the curse that stands over all human beings by virtue of their failure to meet the demands of God.”

Jesus.⁹ The latter half of Gal 3:13 goes on to explain how Christ redeemed Israel (or Jewish believers) from the curse of the law. Thus, here the New Perspective agrees with traditional readings that the verse is describing the mechanism of the atonement; the difference lies in the scope and intent of the atonement. According to New Perspective readings, the claim of 3:13 is that Christ took on himself the curse of Moses's Law, exhausting its force and enabling the restoration of Israel and the subsequent flow of the Abrahamic blessings to Gentiles as well as Jews.¹⁰ In light of this, Paul warns his audience not to be circumcised, because they would thereby be joining Israel under the Mosaic covenant and its attendant curse.

Apocalyptic Readings

A third perspective can be identified as the apocalyptic reading of Paul and the Law. Prominent proponents include J. Christiaan Beker, J. Louis Martyn, and Martin de Boer.¹¹ On this reading, the redemption that Christ achieves for humanity consists of liberation from the cosmic powers—law, sin, and death—which rule the present evil age. The plight is universal; both Jews and Gentiles are under the curse of these powers and thus need to be redeemed.¹² When Jesus is crucified, he falls under the curse of the Law, as per Deut 21:23. But the cursing voice of the Law is to be distinguished from the voice of God, who does not curse Jesus. Rather, because Jesus is innocent,

9. A reading that sees the “we” as Israel has an impressive pedigree, stretching back to Chrysostom and including luminaries such as Augustine, Aquinas, and Calvin (see John K. Riches, *Galatians through the Centuries* [Oxford: Blackwell, 2008], 171–75, 180). Cf. also T. L. Donaldson, “The ‘Curse of the Law,’” 95–98; Wright, *Climax*, 151–53; J. B. Lightfoot, *Saint Paul's Epistle to the Galatians: A Revised Text with Introduction, Notes and Dissertations* (London: Macmillan, 1890), 253. Advocates do not claim that Paul is completely consistent in his use of these first-person pronouns to refer to Israel. Each usage must be examined in its own right to determine the scope.

10. See Wright (*Climax*, 141), who sees the curse of the Law here specifically as exile; cf. more recently, idem, *Paul and the Faithfulness*, 863–67. Richard B. Hays, *The Faith of Jesus Christ: The Narrative Substructure of Galatians 3:1–4:11* (Grand Rapids: Eerdmans, 2002), 179, sees Christ here as a “representative figure, taking the curse upon himself” and speaks of a “pattern of exchange.” Cf. Morales, “Words,” 275.

11. The view is adumbrated in Ernest D. Burton, *A Critical and Exegetical Commentary on the Epistle to the Galatians*, ICC (New York: Scribner's, 1920), 168–76; See Martinus C. de Boer, *Galatians: A Commentary*, NTL (Louisville: Westminster John Knox, 2011), 213–14; J. C. Beker, *Paul the Apostle: The Triumph of God in Life and Thought* (Philadelphia: Fortress, 1980), 184–86, 261; J. Louis Martyn, *Galatians: A New Translation with Introduction and Commentary*, AB 33A (New York: Doubleday, 1997), 316–22, 324–28.

12. See Martyn, *Galatians*, 317; de Boer, *Galatians*, 209–210, who holds that the phrase “the curse of the law” means that the law itself is a curse, not that it merely pronounces or brings a curse.

God vindicates him by raising him from the dead. This shatters the power of the Law, because it has unjustly cursed Christ. The Law is thereby exposed as a cosmic power that is not representative of God's righteousness. Believers, then, are liberated from enslavement to the Law and the powers.¹³

The Common Element in the Three Readings

Despite their great differences, a common element may be seen in the readings of these three perspectives. Namely, they all assume that Gal 3:13 is describing the *mechanism* by which atonement or redemption from the curse is achieved. The mechanism is that Jesus vicariously takes the curse of God (or the Law) on himself. This, it is assumed, is what Paul means when he says that Christ became a curse "for us." Further, all these readings assume that Christ *was* cursed by God or the Law simply by virtue of the fact that he was crucified. This, they assume, is what Paul means when he quotes Deut 21:23.¹⁴ Each of these assumptions merits closer examination.

DOES CRUCIFIED EQUAL CURSED BY GOD?

The best place to begin is by discussing Paul's citation of Deut 21:23. Here, three main points should be taken into account.

Cursed by Virtue of Crucifixion?

First, and of greatest importance, Deut 21:23 does not, in context, pronounce a curse on all victims of crucifixion (or hanging) *ipso facto*.¹⁵

13. See Martyn, *Galatians*, 319: "Jesus died in *conflict* with the Law," which according to Gal 3:19 was "instituted by angels in God's absence" (p. 325); de Boer, *Galatians*, 213: "Christ has triumphed over the law's curse, putting an end to its malevolent effects on human life." This view can be found as far back as Adolf Hilgenfeld, *Der Galaterbrief* (Leipzig, 1852), 160–61.

14. An exception is Martyn, *Galatians*, 321, who emphasizes that Deut 21:23 is a mere proof-text for Paul, who has completely ignored the original meaning and context of the law.

15. In its ancient context, Deut 21 had little to do with Roman-style crucifixion. Deuteronomy 21:23 describes not the method of execution (i.e., death by crucifixion or hanging) but rather the method of displaying an already-executed corpse. Cf. Jeffrey H. Tigay, *Deuteronomy*, JPS Torah Commentary (Philadelphia: Jewish Publication Society, 1996), 198; Richard D. Nelson, *Deuteronomy: A Commentary*, OTL (Louisville: Westminster John Knox, 2002), 261–62; Peter C. Craigie, *The Book of Deuteronomy*, NICOT (Grand Rapids: Eerdmans, 1976), 285. Further, the text likely refers to impaling the corpse on a stake, or hanging it by rope from a tree. See David W. Chapman, *Ancient Jewish and Christian Perceptions of Crucifixion*, WUNT 2/244 (Tübingen: Mohr Siebeck, 2008), 117–49, for an overview of how Deut 21:23 was understood with relation to various methods of suspension in the Second Temple period; cf. Gunnar Samuelsson, *Crucifixion in Antiquity: An Inquiry into the Background and Significance of the New Testament Terminology of Crucifixion*, WUNT 2/310

Rather, the law explicitly refers only to those who commit a sin punishable by death—most likely blasphemy or apostasy—and who are subsequently executed and displayed.¹⁶ If an innocent person is executed and hanged, a curse does not fall on him solely by virtue of his suspension. The reason for execution was the determining factor. It was the blasphemy or apostasy that brought the curse, not the method of execution. In fact, numerous faithful Jews were crucified under various regimes, but no one believed that those martyrs had therefore fallen under the curse of God simply by virtue of their means of execution.¹⁷ In the OT, the corpses of Saul and Jonathan had been displayed publicly by the Philistines (2 Sam 21:12), but no one took that to mean that Saul and Jonathan were cursed by the Law.¹⁸ Without a doubt, crucifixion was a shameful, repugnant and curse-worthy method of execution, but to say this is quite different from saying that whoever happens to be crucified is *per se* cursed by God.

Ambiguous Syntax in Deuteronomy 21:23

Second, it is important to realize that the syntax of Deut 21:23 is not at all clear. The key construct phrase at the end (קללת אלהים) is ambiguous and has been understood in at least three different ways:¹⁹

(Tübingen: Mohr Siebeck, 2013), 216–17, 228–31, 253–54. The original referent of Deut 21:23 matters little to our reading of Gal 3:13, because by the time of Paul's letter it appears that at least some Jews understood this text to apply to people executed by Roman-style crucifixion. Thus, for example, 11QT^a 64.8–13 cites Deut 21:23's curse on the crucified criminal, evidently referring it to both ante- and postmortem suspensions. See F. García-Martínez, "Galatians 3:10–14 in the Light of Qumran," in *The Dead Sea Scrolls and Pauline Literature*, ed. Jean-Sébastien Rey, STDJ 102 (Leiden: Brill, 2014), 56–60; J. A. Fitzmyer, "Crucifixion in Ancient Palestine, Qumran Literature, and the New Testament," *CBQ* 20 (1978): 493–513; M. Bernstein, "כי קללת אלהים תלוי" (Deut 21:23): A Study in Early Jewish Exegesis," *JQR* 74 (1983): 21–45. See also John Granger Cook, *Crucifixion in the Mediterranean World*, WUNT 327 (Tübingen: Mohr Siebeck, 2014), 236, on Philo, *Somn.* 2.213, where Philo appears to refer to death by crucifixion.

16. P. Fredriksen, "Judaism, the Circumcision of Gentiles, and Apocalyptic Hope: Another Look at Galatians 1 and 2," *JTS* 42 (1991): 532–64; idem, *From Jesus to Christ: The Origins of the New Testament Images of Jesus* (New Haven: Yale University Press, 1988), 147; O'Brien, "Curse," 55–76; Caneday, "Redeemed," 199.

17. E.g., Philo, *Flacc.* 72, 83–88, refers to the numerous righteous Alexandrian Jews crucified under Flaccus, never hinting that they were under a curse. Josephus, *Ant.* 12.256, mentions the crucified martyrs of the Maccabean revolt, the Pharisees crucified under Alexander Jannaeus (*Ant.* 13.380), the 2,000 Judeans crucified by Varus after Herod's death (*Ant.* 17.295; *J.W.* 2.75), and the massive number crucified in the wake of the Jewish revolt. He gives no indication that he views any of these victims as cursed by God. For extensive discussion of crucifixion in Mediterranean antiquity, see now Cook, *Crucifixion*.

18. Cf. A. Andrew Das, *Paul and the Jews* (Peabody, MA: Hendrickson, 2003), 47.

19. See Lightfoot, *Galatians*, 150, for a thorough accounting of the textual data.

1. LXX renders it as “accursed by God” (κεκατηραμένος ὑπὸ θεοῦ). The Temple Scroll (11QT 64.6–13), Targum Neofiti (ליט קדם ייי כל דצליב), and the Vulgate (*maledictus a Deo*) all appear to read it this way.
2. Many traditions read the phrase as referring to the cause for execution. That is, the person who is crucified has cursed God and thus merited death. This is how Josephus,²⁰ Symmachus (διὰ βλασφημίαν θεοῦ ἐκρεμάσθη),²¹ Targum Onqelos (ארי על דחב קודם ארי על דצליב), and numerous rabbinic texts interpret the phrase.²² Note that on this reading the crucified person is not cursed at all.
3. Other traditions take the phrase to mean that the hanging corpse is an affront to God. As Targum Pseudo-Jonathan explains, it grieves God to see his image treated in such a repugnant fashion.²³ Therefore, the executed corpse should be buried the same day, in order to avoid offending God. This is the reading of Aquila and Theodotion, as well as many later rabbinic sources.²⁴

In short, it appears likely that many, if not most, Jews of Paul’s day would not have heard Deut 21 pronounce a curse on anyone at all, much less on all victims of crucifixion. Further, any curse that did attach to the victim of crucifixion was probably seen as the result of the victim’s crime, not his mode of execution.²⁵

20. *Ant.* 4.202: “He that blasphemes God, let him be stoned; and let him hang upon a tree all that day, and then let him be buried in an ignominious and obscure manner” (Ὁ δὲ βλασφημήσας θεὸν καταλευσθεὶς κρεμάσθω δι’ ἡμέρας καὶ ἀτίμως καὶ ἀφανῶς θαπτέσθω). Here the hanging is postmortem; stoning is the mode of execution. The corpse is to be buried before evening, in an ignominious fashion befitting the person’s cursed status.

21. Jerome quotes this in Latin as *quia propter blasphemiam Dei suspensus est* (*Comm. Gal.* 3:13).

22. See, e.g., m. Sanh. 6:4; b. Sanh 45b; Sifre Deut. 221 (מפני שקלל אח השם).

23. קילותא קדם אילקא למצלוּב גבר אלהן חובוי גרמו ליה ומן־בגלל דבדיוקנא דיי אתעבד. תקברוניה עם מטמוע שימשא. This targum also makes clear that the death is by stoning and the suspension is postmortem.

24. Jerome, *Comm. Gal.* 3:13, quotes Aquila and Theodotion in Latin as *maledictio Dei est suspensus*. Jerome attributes such a reading to Ariston of Pella (λοιδορία θεοῦ), and to Ebion (ἔβρις θεοῦ), though these versions are ambiguous and could be taken to refer to the cause for execution. Lightfoot, *Galatians*, 150–51, takes it to be the dominant interpretation of the phrase in Jewish writers from at least the second century A.D. on, spurred on primarily by the mass crucifixions during the Jewish revolts. These necessitated a reading of the text that did not see the victim as cursed by God.

25. That is, a blasphemer who was stoned and buried immediately was under no less a curse than a crucified blasphemer. Rather, the point of the law was to prohibit the cursed corpse of the blasphemer from being exposed overnight.

Paul's Notable Omission

Third, when we come to Paul's own citation of the passage, we see that he has omitted the Septuagint's phrase "by God" (ὕπὸ θεοῦ).²⁶ This fact is rather damaging to the Reformed/Lutheran view, since Paul would then be obscuring a key point he is trying to make, namely, that it is *God's* wrath against sin that Jesus satisfies or bears on the cross.²⁷ On the other hand, the apocalyptic interpretation finds the omission highly significant.²⁸ This view argues that, for Paul, it is the Law, not God, that has cursed Jesus, and it has done so unjustly. However we choose to explain it, Paul's omission of "by God" has the significant effect of distancing the curse from God, at least rhetorically.

To summarize, in its original context, Deut 21 clearly does not pronounce a curse on all victims of crucifixion. If it pronounces a curse at all, that curse would only fall on those who had committed sins worthy of execution. Every Jewish source that we have from the Second Temple period (as well as the rabbinic era) concurs. The burden of proof, then, must fall on those who want to argue that the Second Temple Jew named Paul is the sole exception.

PAUL'S USE OF DEUTERONOMY 21:23 IN GALATIANS 3:13

In light of these facts, it is quite surprising what a survey of the secondary literature on Gal 3 turns up. Almost without exception, commentators assume, often without any discussion, that Deut 21:23 lays a universal

26. This is, of course, assuming that Paul is quoting a Greek translation here. The assumption is supported by the inclusion of $\pi\acute{\alpha}\varsigma$ and $\epsilon\pi\iota$ $\xi\acute{\upsilon}\lambda\omicron\upsilon$, neither of which have a clear basis in the MT. Paul notably diverges from LXX in his use of $\epsilon\pi\iota\kappa\alpha\tau\acute{\alpha}\rho\alpha\tau\omicron\varsigma$ instead of $\kappa\epsilon\kappa\alpha\tau\eta\rho\alpha\mu\acute{\epsilon}\nu\omicron\varsigma$. This probably occurs by way of influence from Deut 27:26, which Paul quotes in Gal 3:10. Some have argued that Paul is employing *gezerah shawah* here to make the point that the curse of the Law is the curse on the crucified victim (see, e.g., F. F. Bruce, *The Epistle to the Galatians: A Commentary on the Greek Text*, NIGTC [Grand Rapids: Eerdmans, 1982], 157–58). If this is the case, however, it is difficult to understand why he writes $\gamma\epsilon\nu\acute{\omicron}\mu\epsilon\nu\omicron\varsigma$ $\kappa\alpha\tau\acute{\alpha}\rho\alpha$ rather than $\gamma\epsilon\nu\acute{\omicron}\mu\epsilon\nu\omicron\varsigma$ $\epsilon\pi\iota\kappa\alpha\tau\acute{\alpha}\rho\alpha\tau\omicron\varsigma$.

27. Exegetes from this tradition typically deny that the omission is significant. See, e.g., M. Silva, "Galatians," in *Commentary on the New Testament Use of the Old Testament*, ed. G. K. Beale and D. A. Carson (Grand Rapids: Baker, 2011), 797.

28. De Boer, *Galatians*, 213, considers this "a substantive, theological" change. Franz Mussner, *Der Galaterbrief*, HThKNT 9 (Freiburg: Herder, 1974), 233, thinks it is intentional, because Paul cannot imagine Christ being cursed by God; cf. Ronald Y. K. Fung, *The Epistle to the Galatians*, NICNT (Grand Rapids: Eerdmans, 1988), 148; Martyn, *Galatians*, 320–21; Burton, *Galatians*, 172; Beker, *Paul*, 187; H.-W. Kuhn, "Jesus als Gekreuzigter," *ZTK* 72 (1975): 36. James D. G. Dunn, *The Epistle to the Galatians*, BNTC (Peabody, MA: Hendrickson, 1993), 177, on the other hand, argues that, for Paul, there is "no distinction" between the Law and God.

curse on victims of crucifixion, regardless of their guilt or innocence.²⁹ For example, Dieter Georgi states, “The law Paul cites in this verse curses everyone who hangs on a tree—including Jesus—quite objectively.”³⁰ Martin Hengel likewise declares, “Jews would inevitably understand talk of a crucified Messiah as blasphemy, because of Deut. 21.23. The Messiah of Israel could never ever at the same time be the one who according to the words of the Torah was accursed by God.”³¹ F. F. Bruce puts it bluntly: to a Jew, a crucified Messiah was “a blasphemous contradiction in terms.”³²

This assumption is so prevalent and unquestioned that many scholars perform logical gymnastics to address the difficulty it presents. A common solution is represented by the apocalyptic strand of interpretation. On this view, prior to his Damascus road experience, Paul had himself used Deuteronomy’s curse to prove, against the Christians, that Jesus could not be the Messiah. On the way to Damascus, however, he had a revelation that led him to see that the very Jesus who was cursed by the Law had been vindicated and exalted by God, and was, indeed, the Messiah. Paul was now confronted by a paradox: the Law has cursed Jesus, but God has raised him from the dead. So much the worse, he reasoned, for the Law. As Martyn puts it, “It was in the cross that Paul came to see a momentous fact about the Law: its cursing voice is not the voice of God.”³³

29. See most recently Mark T. Finney, “*Servile Supplicium*: Shame and the Deuteronomic Curse—Crucifixion in Its Cultural Context,” *BTB* 43 (2014): 125–34. Exceptions include P. Fredriksen, “Paul and Augustine: Conversion Narratives, Orthodox Traditions, and the Retrospective Self,” *JTS* 37 (1986): 12, who wryly observes that “the spiritual status of the deceased cannot be inferred from the disposition of the body”; Das, *Paul*, 47; Donaldson, *Paul*, 170–71.

30. Dieter Georgi, *Theocracy in Paul’s Praxis and Theology* (Minneapolis: Fortress, 1991), 120.

31. Martin Hengel, *Crucifixion in the Ancient World and the Folly of the Message of the Cross* (Philadelphia: Fortress, 1977), 43.

32. Bruce, *Galatians*, 166. Richard N. Longenecker, *Galatians*, WBC 41 (Dallas: Word, 1990), 122, finds this contradiction to be “Undoubtedly the central problem for all Jewish Christians.” Occasionally, appeal is made to the language of σκάνδαλον in 1 Cor 1:23, but this is more likely a reference to the shameful crucifixion of Jesus as a sign of failure, not to some divine cursedness that inevitably attached to such a death. Others who voice opinions similar to Bruce’s include Martyn, *Galatians*, 320; Mussner, *Galaterbrief*, 233; Sänger, “Verflucht”; de Boer, *Galatians*, 212, 214; Dieter Lührmann, *Galatians*, CC (Minneapolis: Fortress, 1992), 61; Matera, *Galatians*, 120; Dunn, *Galatians*, 178; Christian Dietzfelbinger, *Die Berufung des Paulus als Ursprung seiner Theologie*, WMANT 58 (Neukirchen-Vluyn: Neukirchener Verlag, 1985), 29–42. Hans Dieter Betz, *Galatians: A Commentary on Paul’s Letter to the Churches in Galatia*, Hermeneia (Philadelphia: Fortress, 1979), 152, is ambivalent.

33. Martyn, *Galatians*, 326; cf. Beker, *Paul*, 187; Dietzfelbinger, *Berufung*, 29–42. Against this view, see Sanders, *Paul*, 25, who notes that neither Paul nor other early Christians actu-

Another “solution” is offered by the Reformed or Lutheran reading. It holds that, while the pre-Damascus Paul used Deut 21 against Christians, the post-Damascus Paul ingeniously turned the curse in his favor by proclaiming that, while Christ was indeed cursed, it was on behalf of “us” (Christians), not because of his own sins.³⁴ Again, this assumes that for early Christians it was an unavoidable conclusion—a hard fact—that Jesus, simply by virtue of his method of execution, was under the curse. Early Christians could not deny this, so they decided to turn it to their advantage. This is a wildly implausible scenario. Everything we know about the interpretation of Deut 21:23 in the Second Temple period leads us to suppose that early Christians would have taken the much simpler course of action and heartily disputed the charge that Jesus was cursed by Deuteronomy, inasmuch as he was not in fact guilty of any sin meriting execution.³⁵ Of course, it certainly makes sense that Paul used Deut 21:23 against Christians prior to his encounter with Jesus, but it is wholly inconceivable that he would have continued to believe that Jesus was cursed after his experience. His change of mind about Jesus’s guilt would have entailed a change of mind about Jesus’s cursedness. The logical linkage is tight, allowing for only two options: either (a) Jesus was rightly executed for blasphemy and is thus

ally seem to have reasoned this way. Cf. Donaldson, *Paul*, 169–73; Douglas A. Campbell, *The Deliverance of God: An Apocalyptic Rereading of Justification in Paul* (Grand Rapids: Eerdmans, 2009), 152, who observes that after the fall of Jerusalem in A.D. 70, no Jew who saw righteous Jews crucified reasoned that therefore the Law was wrong. See also C. M. Tuckett, “Deuteronomy 21.23 and Paul’s Conversion,” in *L’Apôtre Paul: Personnalité, style, et conception du ministère*, ed. A. Vanhoye, BETL 73 (Leuven: Leuven University Press, 1986), 347–48.

34. E.g., Moo, *Galatians*, 214, recognizes that the curse of Deuteronomy falls only on those who have committed “heinous sin” but seems to ignore that fact when he states, “Paul likewise implies that Christ has suffered the curse in connection with being hung on a tree because of sin—but because of the sins of others, not his own.” A similar solution is offered by Seyoon Kim, *The Origin of Paul’s Gospel* (Grand Rapids: Eerdmans, 1982), 46, 50; N. Dahl, “The Atonement—An Adequate Reward for the Akedah? (Rom 8:32),” in *Neotestamentica et Semitica: Studies in Honour of Matthew Black*, ed. E. Ellis and M. Wilcox (Edinburgh: T&T Clark, 1969), 23; Alan F. Segal, *Paul the Convert: The Apostolate and Apostasy of Saul the Pharisee* (New Haven: Yale University Press, 1990), 122–23. Even more puzzling is Schreiner, *Galatians*, 217, who understands that the pre-Christian Paul would have believed Jesus to be cursed only because he also believed that Jesus was guilty of blasphemy. In Schreiner’s view, though, when Paul was converted, he did not decide that Jesus was innocent and thus not cursed. Rather, he continued to believe that Jesus was cursed by God, only now arguing that this cursedness was substitutionary.

35. Cf. Donaldson, *Paul*, 171; Fredriksen, *From Jesus to Christ*, 147. One subtle piece of evidence in favor of this point is Acts 13:28–29, where *ξύλον* evokes Deut 21:22–23, but where the Lukan Paul’s main point is that there was no valid basis on which Jesus should have been crucified. This may indicate that early Christians were reading Deut 21:22–23 in context and denying a Jewish charge that applied it to Jesus.

under the curse of the law, or (b) Jesus was an innocent victim and is thus under no curse at all.

BECOMING A CURSE

We can turn now to the first half of our text, where Paul says that “Christ redeemed us from the curse of the Law, having become for us a curse.” The first thing to notice is the unusual language. Paul does not say that Christ became “accursed.” He says that Christ became “a curse.” Few commentators take notice of the strange wording, and those who do almost all quickly explain it away as a clear instance of metonymy.³⁶ It means, they claim, that Christ became the object of the curse, that is, he was accursed.³⁷ In the same way, commentators are almost unanimous in assuming that the participial phrase is giving the precise means or mechanism by which Christ redeemed “us” from the Law.

Atonement Mechanisms

Exegetes differ in how they explain this mechanism, but they typically translate it into other linguistic domains, depicting it as an economic or legal transaction. Thus, John Murray will say, “Christ has *purchased* his people and the *price* of the purchase was that he himself became a curse.”³⁸ Calvin takes the curse to refer to legal guilt for sin, which is transferred from humans to Christ, who then bears the wrath of God as the punishment for that legal guilt.³⁹ Almost without exception, commentators see Paul referring to some sort of substitution, vicarious representation, or legal exchange.⁴⁰ It seems that everyone is eager to fill in the gaps in Paul’s

36. Mussner, *Galaterbrief*, 233; Sam K. Williams, *Galatians* (Nashville: Abingdon, 1997), 93; Martyn, *Galatians*, 318; Burton, *Galatians*, 171; de Boer, *Galatians*, 211; Dunn, *Galatians*, 177.

37. In favor of this understanding is the way that Paul uses ἐπικατάρατος in 3:13b, apparently in apposition to γίνεσθαι κατάρα. See below for my argument in favor of distinguishing between the two.

38. John Murray, *Redemption, Accomplished and Applied* (Grand Rapids: Eerdmans, 1955), 44 (emphasis mine).

39. Calvin, *Institutes*, 2.16.6; cf. a similar explanation in Matera, *Galatians*, 124. This sort of explanation misses the point that for Paul the curse is not an eschatological or postmortem potential reality but is clearly a present reality in Israel’s history. Jesus’s death does not prevent the curse from coming on his people but rather lifts the curse on them. Cf. Morales, “Words,” 274.

40. See the discussion in Stephen Finlan, *The Background and Content of Paul’s Cultic Atonement Metaphors* (Atlanta: SBL, 2004), 101–11; Betz, *Galatians*, 150; Mussner, *Galaterbrief*, 233.

statement with some type of atonement theory or narrative framework. Often, the appeal is to the scapegoat of Yom Kippur, sent out into the wilderness carrying the sins of the people.⁴¹ Others point to a Hellenistic analogue, the *pharmakos* ritual, in which a city or town would choose one person whom they would curse and ritually expel from the community in hopes of gaining relief from whatever curse was plaguing their city with disease or disaster.⁴²

Thus, it is thought that Paul assumes his audience is familiar with such paradigms of curse-transference or sacrificial exchange and that he depicts Christ's death in those familiar terms. If, however, this was a shared cultural assumption between Paul and his audience, then Paul has no need to provide a proof-text for it from Deut 21:23. Why not simply say that Christ delivered us from the curse by being cursed for us, and leave it at that? The audience, familiar with a sacrificial exchange model, would then know that God had transferred the curse from us to Christ. Indeed, if Paul's argument depends on the logic of sacrificial exchange, then his citation of Deut 21:23 actually serves to obscure his point. His citation would likely raise many questions on the part of his audience. Was the curse that came on Christ (that is, the specific curse of Deut 21:23) the same as the generalized "curse of the law" in Gal 3:10? Does the curse of Deut 21:23 actually apply to Jesus, since he was in fact innocent? Does Deut 21:23 provide any indication that the crucified person could bear this curse vicariously?

A more serious objection against the sacrificial exchange reading has to do with how Paul understands the status of the curse of the law. It seems clear that Paul believes that the Law has pronounced a curse on Israel. If, as the exchange view holds, Christ takes the curse of the law on himself in Israel's stead and, as Wright puts it, "exhausts" the curse,⁴³ then the curse

41. Lev 16:8–10; cf. Daniel R. Schwarz, "Two Pauline Allusions to the Redemptive Mechanism of the Crucifixion," *JBL* 102 (1983): 259–69; Longenecker, *Galatians*, 12; Finlan, *Background*, 105–6; Hartwig Thyen, *Studien zur Sündenvergebung im Neuen Testament und seinen alttestamentlichen und jüdischen Voraussetzungen*, FRLANT 96 (Göttingen: Vandenhoeck & Ruprecht, 1970), 188–89. There is some evidence that "curse" language was associated with the Levitical scapegoat, even though Leviticus itself does not do so. Barnabas 7:6–9 calls the scapegoat cursed (ἐπικατάρατος). Note, however, that Barnabas sees the scapegoat as prefiguring Jesus not in the sense that he was cursed by God but in that he was cursed by the people.

42. See, especially, B. H. McLean, *The Cursed Christ: Mediterranean Expulsion Rituals and Pauline Soteriology*, JSNTSup 126 (Sheffield: Sheffield Academic, 1996); Davis, *Christ as Devotio*. For discussion of the *pharmakos* in Greek culture and religion, see Dennis D. Hughes, *Human Sacrifice in Ancient Greece* (London: Routledge, 1991), 139–65.

43. Wright, *Climax*, 151–52; Martyn, *Galatians*, 317, likewise speaks of the "termination" of the Law's curse. Neither can account for the way that Paul presents the curse as currently threatening his audience.

is no longer in force and cannot threaten Israel any longer. But, this does not seem to be the way Paul understands the curse. In his view, it seems, the curse remains on Israel and on all those who choose to place themselves under the Law of Moses. In other words, Christ's death does not appear to have done away with the curse altogether (as a *pharmakos* would) or to have wrought an objective change in the relationship between God and Israel. In fact, it seems that redemption from the curse of the law depends ultimately on the individual believer's faith, which unites the believer with Christ.⁴⁴

"Becoming a Curse" as Status Loss

Given these difficulties, I propose that a better explanation of this word choice is available. Two Greek texts roughly contemporary with Paul help illustrate how becoming a curse is to be distinguished from becoming accursed. First, in the mid- to late-second-century Protevangelium of James, Anna the prophetess (known from Luke 2:36–38) bemoans her widowhood and her childlessness, crying out, "I have become a curse [ἐγὼ κατάρα ἐγενήθην] before the sons of Israel and I have been shamed and mocked by being expelled from the temple" (3:1). Here, becoming a curse appears to mean being shamed, ridiculed, and suffering social ostracism.

The second example comes from the early-third-century Acts of Thomas.⁴⁵ Here, the Indian captain Siphor relates to a king how Thomas healed his wife and daughter, both demon-possessed: "You know, O king, what pain and suffering I had regarding my daughter. . . . For I became a joke and a curse [ἐγενόμην γὰρ γέλως καὶ κατάρα] to our whole country" (104:8). Here is clear evidence that to become a curse is to become the object of society's ridicule (γέλως) or reproach. It is to have one's reputation so destroyed that one's name becomes a stock element in jokes or curse formulas. The honor/shame texture of the language is obvious.

Perhaps even more important than these texts are the numerous OT passages Paul would have known which describe people either "being" or "becoming" a curse. When these examples are read in context, it is clear that "becoming a curse" should be distinguished from "being accursed."⁴⁶

44. Cf. Gal 2:20; 3:27–28.

45. For introductory issues, see Harold W. Attridge, *The Acts of Thomas* (Salem, OR: Polebridge, 2010). There is some dispute as to whether the Acts were originally written in Greek or Syriac. See A. F. J. Klijn, *The Acts of Thomas: Introduction, Text, and Commentary*, NovTSup 108 (Leiden: Brill, 2003), 1–9.

46. Among commentators on Galatians, I have found that only Mussner, *Galaterbrief*, 233, and Philip F. Esler, *Galatians*, NTR (London: Routledge, 1998), 188, note the OT background to the language of becoming a curse.

First, in Jer 24:9, the prophet is told that the Judahites who remain in the land after the Babylonian exile will become a reproach, a proverb, a hatred, and a curse in every place they are scattered.⁴⁷ In this text, to become a curse is to suffer a great dishonor, to be shorn of any status, and to have one's name used as a curse word. As William Holladay puts it, the Hebrew Vorlage refers to having one's name made into a curse-formula ("may it be to you as happened to so-and-so").⁴⁸ This is made explicit in Jer 36:22 LXX (29:22 MT), which says of the exiles, "They will be left as a curse in exile, saying, 'May the Lord make you like Zedekiah and Ahab, whom the king of Babylon roasted in the fire.'"⁴⁹ Again, in Jer 51:8 LXX (44:8 MT), the Lord describes how Israel has angered God and has suffered the punishment of "becoming a curse and a reproach among all the nations of the earth."⁵⁰ Here once more, the language is that of honor/shame, so that to become a curse is not simply to be cursed by God but to become the object of cursing and derision in the mouth of others.⁵¹

Both Isa 64:9 LXX (64:10 MT) and 65:23 LXX use the same idiom. Notably, the Hebrew underlying these two verses does not contain the normal word for "curse," but rather words denoting desolation or terror (קִרְבָּן, קִרְבָּן). The translator felt in both cases that the disgrace and desolation Israel experienced in exile could be described as "becoming a curse." Sirach 23:26 offers a final example, declaring that the woman who lacks virtue will "leave behind a memory of her for a curse [εἰς κατάραν] and her reproach will not be erased." Here "curse" is again attached to disgrace or shame and speaks of a complete stripping of one's reputation.

In all these cases, we find people becoming a curse in the sense of becoming objects of reproach, mockery, and ostracism. To become a curse, it seems, is to be thought by others (whether rightly or wrongly) to be under a curse. It is most important to note that one who becomes a curse is not necessarily cursed by God. Of course, someone whom God has cursed will

47. LXX: καὶ δώσω αὐτοὺς εἰς διασκορπισμὸν εἰς πάσας τὰς βασιλείας τῆς γῆς καὶ ἔσονται εἰς ὀνειδισμὸν καὶ εἰς παραβολὴν καὶ εἰς μῖσος καὶ εἰς κατάραν ἐν παντὶ τόπῳ οὗ ἔξῃσα αὐτοὺς ἐκεῖ.

48. William Lee Holladay, *Jeremiah 1: A Commentary on the Book of the Prophet Jeremiah, Chapters 1–25*, Hermeneia (Philadelphia: Fortress, 1986), 659–60. This meaning is made clear in Midr. Num. 9:35, 40. Cf. the same sentiment in Jub. 20:6.

49. LXX: καὶ λήμψονται ἀπ' αὐτῶν κατάραν ἐν πάσῃ τῇ ἀποικίᾳ Ἰουδα ἐν Βαβυλῶνι λέγοντες ποιήσαι σε κύριος ὡς Σεδεκίαν ἐποίησεν καὶ ὡς Ἀχιαβ οὗς ἀπετηγάνισεν βασιλεὺς Βαβυλῶνος ἐν πυρὶ.

50. LXX: ἵνα ἐκκοπήτε καὶ ἵνα γένησθε εἰς κατάραν καὶ εἰς ὀνειδισμὸν ἐν πᾶσιν τοῖς ἔθνεσιν τῆς γῆς.

51. Cf. also Jer 42:18 (49:18 LXX) and Zech 8:14.

also frequently become a curse, that is, an object of social reproach. Nevertheless, the two are distinct. One can become a curse without actually being cursed by God.⁵²

In light of this, we can understand Paul's wording more clearly. Rather than say that Jesus was cursed by God, Paul chooses to say that Jesus became a curse. This refers to the total loss of social status—the utter humiliation—that Jesus endured in his death by crucifixion. Jesus was actually innocent and beloved of God, not cursed by God. Nor, clearly, was he under the curse of the Law, because Deut 21:23 did not apply in light of Jesus's innocence. But, as the Gospels and other early sources make clear, Jesus's Jewish opponents did consider him a blasphemer, a false prophet, a sorcerer who led people astray.⁵³ Thus, in their view, he was indeed guilty and cursed by God; it was appropriate that he suffer the disgrace of crucifixion. This accounts for Paul's citation of Deut 21:23, as well as his modification of it. Paul cites the passage in order to explain how Jesus "became a curse," that is, how he came to be considered abominable and cursed by his countrymen, but not by God.⁵⁴

It does not seem, therefore, that Paul here describes the mechanism by which Christ atoned for sins. Rather, Paul is making a point about the lengths to which Christ went to redeem his people from the curse. To put it another way, Paul's statement should be understood less in terms of sys-

52. As discussed above, Anna in the Protevangelium of James provides a clear example.

53. For this charge against Jesus, see Mark 14:63–64; cf. the extensive discussion in Graham N. Stanton, "Jesus of Nazareth: A Magician and False Prophet who Deceived God's People?" in *Jesus and Gospel* (Cambridge: Cambridge University Press, 2004), 127–48. It is plausible that references in Acts 18:6; 26:11 to "blaspheming Jesus" have to do with saying that Jesus was rightly executed for leading the people astray and thus under the curse of Deut 21:23. Something similar probably also lies behind the formula Ἀνάθεμα Ἰησοῦς (1 Cor 12:3). Cf. Gert Jeremias, *Der Lehrer der Gerechtigkeit*, SUNT 2 (Göttingen: Vandenhoeck & Ruprecht, 1963), 131–35.

54. Cf. Burton, *Galatians*, 173, who considers this option. See also the discussion in Barnabas Lindars, *New Testament Apologetic: The Doctrinal Significance of the Old Testament Quotations* (London: SCM, 1961), 233. It is possible that Deut 21:22–23 was part of a primitive Christian *testimonia* collection; see Max Wilcox, "'Upon the Tree': Deut 21:23 in the New Testament," *JBL* 96 (1977): 98. For discussion of early Christian *testimonia*, see Martin C. Albl, *And Scripture Cannot Be Broken: The Form and Function of the Early Christian Testimonia Collections*, NovTSup 96 (Leiden: Brill, 1999). If Deut 21:22–23 was used as a *testimonium*, it may have been read by early Christians in a peshet fashion as a step-by-step prediction of Jesus's passion: first tried, then hanged on a tree and considered a curse of God, finally removed from the tree before night to be buried. Thus, Paul would simply be indicating in Gal 3:13 that Christ had redeemed his people through the crucifixion, as predicted in Deut 21:23. The mechanism of atonement would still not be in view. Justin appears to read Deut 21:23 as predictive prophecy; see p. 206 below.

tematic theology and more in terms of a rhetorical appeal to *pathos*. Indeed, nothing in the syntax of the passage demands that Paul's statement be read as describing the mechanism of atonement.⁵⁵ Rather, the closest parallel to our passage, which occurs only a few paragraphs later, in Gal 4:4–5, clearly points away from such a reading. Here both the syntax and the concepts echo 3:13: born of a woman, born under the Law, Christ redeems Israel from bondage under the Law. Few would argue that this text describes the specific mechanism of redemption or atonement. Instead, the focus is clearly on the magnitude of the Son's voluntary condescension in order to redeem his people from their plight.⁵⁶ One might fruitfully compare Paul's statement in 1 Cor 9:22: ἐγενόμην τοῖς ἄσθενέσιν ἄσθενής, ἵνα τοὺς ἄσθενεῖς κερδήσω.⁵⁷ Here Paul's flexible behavior is not the mechanism or immediate cause of gaining the weak (that role likely belongs to the preaching of the gospel or the illumination of the Holy Spirit), but is rather a necessary, though not sufficient, step to achieving that goal. He must condescend in order to reach the weak, but the condescension in and of itself is not salvific.⁵⁸

To summarize, then, my reading of the text, I hold that in Gal 3:13 Paul announces that Jesus has redeemed his people from the curse of the Law, but he does not specify the precise mechanism of the atonement. Rather, he states the humiliation to which Christ subjected himself in order to redeem his people. Christ went so far as to die a shameful death, even death on a cross. He became a curse—a total outcast, despised and rejected, thought (wrongly, of course) to be under the curse of God as an executed blasphemer, on the basis of Deut 21:23. He was willing to endure the false accusations and to suffer the heinous death attached to them in order to redeem his people from their slavery.

55. De Boer, *Galatians*, 211, helpfully notes that the verse is not clear as to the relationship between redemption and becoming a curse. He considers it possible that, for Paul, Christ's redemptive work consists of his resurrection (cf. 1 Cor 15:17), not his becoming a curse. He also notes 1 Cor 15:17: if Christ is not risen, the Corinthians are still in their sins.

56. Cf. Phil 2:5–9, which stresses the indignity and dishonor the Messiah endured in order to accomplish God's plan but does not specify the mechanism of atonement. Origen, notably, draws on that passage to explicate Gal 3:13's language of becoming a curse (*Comm. Rom.* 9:4). De Boer, *Galatians*, 211, proposes that Gal 3:13 be read alongside Gal 2:20 as "meant to call attention to the depth of Christ's love." One might also consider 2 Cor 8:9 in this regard.

57. Cf. Origen, *Comm. Matt.* 15:1–2, where he connects Gal 3:13 and 1 Cor 9:20–22.

58. For Paul, the immediate mechanism of redemption is probably better located in the liberating life-giving work of the Spirit. See Gal 4:4–6. Cf. Morales, "Words," 273–76; Bronsdos, "Cross," 3–32.

THE CHURCH FATHERS ON DEUTERONOMY 21:23
AND GALATIANS 3:13

A final important piece of evidence is how Gal 3:13 was read by some of its earliest interpreters. Those readers are chronologically, linguistically, socially, and culturally much closer to Paul's era than modern readers. They often engaged in extensive debate with their Jewish contemporaries, which alerted them to early Jewish readings of the Hebrew Bible. Unfortunately, they are commonly neglected by modern commentators on Galatians.⁵⁹ As we shall see, the church fathers are unanimous in rejecting the idea that Jesus was cursed by God, or that God needed to transfer the curse of the law to an innocent victim for salvation to occur. Similarly, the fathers are aware of Deut 21:23's immediate context and make it clear that they do not read Deut 21:23 as cursing every crucified person *ipso facto*.

We may begin with Justin Martyr.⁶⁰ In his *Dialogue with Trypho*, Justin does not cite Gal 3:13, but he does debate with Trypho whether Jesus was cursed by God or not. Trypho puts forward what was likely a typical early Jewish argument: Jesus was rejected by the people as a deceiver and crucified under the curse of Deut 21:23.⁶¹ Justin strongly disputes this and argues

59. This is all the more unfortunate in light of the fathers' native fluency in Greek, which makes them especially helpful in disputes about lexicon and syntax.

60. Not to be neglected is the text we have mentioned above, Barn. 7:6–9, where the author explains Jesus's death through a Yom Kippur scapegoat typology. Just as the scapegoat was cursed (ἐπικατάρατος) so too was Jesus, Barnabas holds. It was, however, the people of Israel, not God, who cursed the scapegoat and Jesus, according to Barnabas. It is possible, but not certain, that Barnabas is intending to cite and interpret either Deut 21:22–23 or Gal 3:13. James Carleton-Paget, "The *Epistle of Barnabas* and the Writings that later formed the New Testament," in *The Reception of the New Testament in the Apostolic Fathers*, ed. Andrew F. Gregory and C. M. Tuckett (Oxford: Oxford University Press, 2007), 242, sees no dependence here on Gal 3:13.

61. *Dial.* 32.1. Again in 89.2, he raises the objection, here perhaps implying that he thinks crucifixion brings a curse *ipso facto*. If this is the case, and if Justin's Trypho accurately represents a Jewish point of view, it would be the earliest extant example of a Jew holding this view. It is notable, however, that Trypho does not say that the crucified person is cursed *by God*. The omission suggests that Trypho is using curse-terminology to refer to the shamefulness and horror of death by crucifixion, which he cannot imagine being appropriate for the Messiah (cf. *Dial.* 90.1). This reading is confirmed by *Dial.* 93.4, where Justin summarizes Trypho's position: Jesus was "crucified as an accursed enemy of God" (ὡς ἐχθρὸν θεοῦ καὶ καταραμένον . . . ἐσταυρωθεῖν). That is, Trypho is not simply claiming that all victims of crucifixion are cursed, but that Jesus was justly crucified because he was an enemy of God, and was thus under the curse of the Law. For discussion of Deut 21:23 in Justin, see W. C. van Unnik, "Der Fluch der Gekreuzigten: Deuteronomium 21.23 in der Deutung Justinus des Märtyrers," in *Theologia Crucis, Signum Crucis: Festschrift für Erich Dinkler zum 70 Geburtstag*, ed. C. Anderson and G. Klein (Tübingen: Mohr, 1979), 483–99; Sängler, "Verflucht," 279–85; Manzi, "Lannullamento," 5–34.

that, while the Jews thought Christ was under the curse, they were wrong, because he was not guilty of any of the crimes Deuteronomy actually curses:

Now the statement in the Law, *Cursed is every one who hangs on a tree*, strengthens our hope which is sustained by the crucified Christ, not because the crucified one is cursed by God, but because God predicted what would be done by all of you Jews, and others like you, who are not aware that this is he who was before all things . . . Christ.⁶²

Here, Justin makes clear that he does not believe that Deut 21:23 applies to Jesus in the sense that Jesus is under the curse of the Law or God.⁶³ Rather, it is predictive of Jesus's cursedness at the hands of his people.⁶⁴

Similarly, Tertullian, in *Against the Jews* 10.1, stresses that Deut 21:23 only describes the crucified person as cursed by God if that person has committed a sin deserving death. But, Christ was innocent and thus was not cursed by God.⁶⁵ Epiphanius, Ambrosiaster, Jerome, Chrysostom, Hippolytus, and Augustine all take this same approach.⁶⁶ As far as we know,

62. *Dial.* 96.1 (for translation, see Thomas B. Falls, *St. Justin Martyr: Dialogue with Trypho*, ed. M. Slusser [Washington, DC: Catholic University of America, 2003]). Elsewhere, in *Dial.* 90.3, Justin describes Jesus's curse as only apparent (ταύτην τὴν δοκοῦσαν κατάραν). In 93.4, he calls the idea that Christ was cursed by God "irrational."

63. Cf. *Dial.* 94.5: "In the Law a curse is placed upon men who are crucified, but not upon the Christ of God." In 111.2: "Our suffering and crucified Christ was not cursed by the Law."

64. Cf. *Dial.* 95.4; 96.2, where Justin again states that Trypho and his fellow Jews continue to curse Jesus.

65. Tertullian is likely dependent on Justin for this representation of the Jewish point of view as well as the response to it. See J. Quasten, *Patrology*, 3 vols. (Utrecht: Spectrum, 1953), 2:269. Cf. *Marc.* 1.11.1.

66. *Epiphanius*: In *Pan.* 2.79.8 Epiphanius quotes Deut 21:23 with the proviso that it only applies to those who have transgressed the law. In 2.79.10, he declares, "Neither the Gospel nor the Lord received the curse."

Ambrosiaster: In his commentary on Gal 3:13, Ambrosiaster writes, "The person who was offered up to death because of his own sin became accursed because he deserved to die." But, for him, Christ is innocent; this is why Paul says that Christ became "a curse" not "accursed": "The innocent Savior hung on the tree is not himself accursed, but the curse of those by whom he was hung . . . primarily the Jews." For Ambrosiaster, Christ is not accursed by the Law because only "someone who is worthy of death is accursed." For the text of Ambrosiaster, see *Commentaries on Galatians-Philemon*, ed. and trans. G. L. Bray (Downers Grove, IL: IVP Academic, 2009), 17.

Jerome: In *Comm. Gal.* 3:13: "The Jews, intent on bringing dishonor upon our religion, [are fond of alleging] that our Lord and Savior was under the curse of God." Jerome responds: "First of all, we must realize that not everyone who hangs on a tree is cursed before God." He then distinguishes between innocent and guilty victims; only the guilty are under a curse. He goes on to ask whether faithful Jews who are crucified would be cursed, such as the three Hebrew boys of Daniel, or Mordecai. Finally, he claims that the Jews added "by God" to Deut 21:23 in order to shame Christians. He believes that Paul's quotation of the passage in Gal 3:13 (which omits "by God") is faithful to the original. See *St. Jerome: Commentary on*

the only early Christian thinker who held that Jesus was cursed by God at his crucifixion was Marcion, and he believed that it was the lesser god, the demiurge, who had done so.⁶⁷ After Marcion, I have not found any interpreter who held that Christ was cursed by God until Martin Luther, and he makes it clear that he is rejecting the patristic consensus outright when he does so.⁶⁸

Many of the church fathers also comment on the distinction between becoming a curse and being accursed. For example, Ambrosiaster explains “becoming a curse” as a Hebrew idiom and distinguishes it from actually being cursed by God. Christ became a curse, he explains, in that he was cursed by the Jews.⁶⁹ Similarly, Augustine cites Gal 3:13 as a fulfillment of Ps 109:24 which reads: “I became a reproach to them,” that is, to the Jews.⁷⁰

Several of the fathers make it clear that “becoming a curse” refers not to the mechanism of atonement but rather to Christ’s condescension and humility in order to save his people. For example, Gregory of Nyssa thinks that becoming a curse means taking on human flesh in the incarnation, while Origen compares it to Paul’s statement that to the Jews he became a Jew.⁷¹ Jerome, on the other hand, regards the phrase as referring to Christ’s loss of status in his incarnation and death; Jesus became a curse just as wisdom was considered foolish.⁷²

Indeed, when the fathers do propose a mechanism of atonement in their discussions of Gal 3:13, it usually has little to do with Christ vicariously bearing a curse. For instance, Epiphanius holds that Christ frees believers from the curse of the law by giving them a lighter yoke (that is, the gospel),

Galatians, trans. A. Cain, FC 121 (Washington, DC: Catholic University of America, 2010), 141–43.

Chrysostom: See *Hom. Gal.* 3:13.

Hippolytus: *Ben. Is. Jac.* 18.9–12 quotes Gal 3:13 and indicates that it is only unbelievers who hold that Jesus was under the curse of the Law by virtue of his crucifixion.

Augustine: In his exposition of Ps 88, Augustine cites Phil 2 in connection with Gal 3:13 as a proof of Christ’s humility in subjecting himself to death and being considered by his fellow Jews to be cursed and hated by God. Augustine makes it clear that Jesus was not actually hated by God or cursed; that, he says, is the unbelieving view. Cf. also his exposition of Ps 109:24 (“I became a reproach to them”), which Augustine sees as characterizing the attitude of the Jews. He cites Gal 3:13 as the NT fulfillment of the prophecy.

67. Tertullian, *Marc.* 1.11.1.

68. *Comm. Gal.* 3:13.

69. *Comm. Gal.* 3:13 (Bray 17).

70. *Enarrat. Ps.* 109.

71. Gregory of Nyssa, *Against Eunomius* 12.1; Origen, *Comm. Matt.* 15:1–2. Cf. Gregory of Nazianzus, *Or. Bas.* 37.

72. *Comm. Gal.* 3:13 (Cain, 143). Cf. *Epist.* 55.5.

which can be borne without transgressing and coming under the curse.⁷³ Ambrosiaster, on the other hand, takes a Christus Victor approach: redemption comes through Christ's death in that it allows Christ to descend into Hades, liberate the dead, and defeat the devil.⁷⁴

CONCLUSION

To summarize, I have argued three main points: (1) When Paul says that Jesus "became a curse," he is saying not that God cursed Jesus but rather that Jesus condescended to the humility of the cross, was executed by his countrymen in a miscarriage of justice, and was considered by his people to be under a divine curse. (2) When Paul cites Deut 21:23, he does not intend to say that all crucified victims are *de facto* cursed. Rather, for Paul and his contemporaries, the charge and its validity matter. Because Jesus was innocent, he was not under the curse of Deut 21:23. Paul likely cites the passage to explain how Christ's death brought special humiliation in the eyes of the Jewish people. (3) Finally, I have argued that Gal 3:13 is not intended to explain the mechanism of atonement, that is, some behind-the-scenes divine transaction. Rather, the text is meant to emphasize the extent of Christ's suffering in order to redeem his people. The mechanism of redemption is more properly sought in other passages, most likely those that refer to the work of the Spirit in baptism, uniting believers to Christ in his death and resurrection.

73. *Pan.* 1.129.

74. *Comm. Gal.* 3:13 (Bray 17).