



FLORIDA CONFERENCE
OF CATHOLIC BISHOPS
The nonpartisan public policy voice of the Catholic Church of Florida

A PASTORAL LETTER ON THE DEATH PENALTY IN FLORIDA

TO THE CATHOLIC FAITHFUL AND ALL PEOPLE OF GOOD WILL:

The record number of executions in Florida last year, and the increased pace at which they continue to be carried out, call for a response. In 2025, the number of executions conducted by our state more than doubled the previous record and was at least four times higher than any other state in the nation.

In addition to Florida's alarming rate of executions, our state legislature has passed laws in recent years to expand the use of the death penalty. These include repealing the unanimous jury requirement in death penalty sentencing—lowering the threshold to just eight of twelve votes, the lowest of any state—expanding the range of crimes and the class of offenders for which the death penalty may be imposed.

As teachers and leaders of the Catholic Church in Florida, we invite a renewed consideration of this topic that looks beyond partisan lines to the teaching of the Church and her moral authority. We desire to reverse these signs of a culture of death and further a culture of life by promoting a greater respect for human life and its inherent dignity for all people and in all circumstances, even those who have committed grave crimes.

In this letter, we wish to remind Catholics of the teaching of our Church against the use of the death penalty in situations—like our own—where bloodless means are sufficient to punish offenders and protect public safety. We also appeal to the consciences of all citizens of our state as part of the ongoing public debate over this issue.

“YOU HAVE HEARD THAT IT WAS SAID...BUT I SAY TO YOU...” A DEEPER UNDERSTANDING IN THE LIGHT OF THE GOSPEL

In its moral teaching, the Church looks to divine revelation, to what God has revealed about himself and about humanity, the nature of which determines our moral obligations. Above all, the Church looks to Jesus Christ, because in the incarnate Son of God “the full revelation of the supreme God is brought to completion.”¹

As a starting point, a very basic orientation we receive from Jesus in his identity, in his teachings, and in his actions is that God desires to offer mercy to sinners who do not deserve it.

In the Sermon on the Mount, Jesus rejected the use of or appeal to violence and taught his disciples to do the same, insisting instead on the need to offer sinners, whatever their sins might have been, opportunities for redemption and reconciliation. Of particular importance in this context of capital punishment is what he said in Matthew 5:38-39 of the biblical injunction, “an eye for an eye” (*lex talionis*) (cf. Ex 21:24; cf. Lv 24:19-20; cf. Dt 19:21), which can be generalized as the law of proportional retaliation, and, as such, to which appeal is often made to justify capital punishment:

You have heard that it was said, ‘An eye for an eye and a tooth for a tooth.’ But I say to you, offer no resistance to one who is evil. When someone strikes you on [your] right cheek, turn the other one to him as well.

While there may be some discussion of the precise meaning of “turn the other cheek,” it is clear that it cannot be taken to justify capital punishment.² Jesus is calling us to a love – of both God and neighbor (Mk 12:28-34, Mt 22:34-40) – which breaks rather than perpetuates the vicious cycle of violent retribution.

Instead, the gospel teaching of Jesus is opposed to the kind of violence that capital punishment entails. He even rebuked James and John for wanting to destroy the Samaritan village that did not welcome them (Lk 9:52-55). He also dispersed the accusers of a woman caught in adultery, a capital crime in their law,³ who questioned him about applying the death penalty by stoning her: “Let the one among you who is without sin be the first to throw a stone at her.” (Jn 8:7). As with the adulterous woman, he not only spoke of but showed God’s love for sinners, whatever their sins might be, and called for their repentance, not destruction.

Further, his instructions for adjudicating wrongdoing in Matthew 18:15-18 are aimed at reconciliation and restoration, but even when they fail, the sinner is simply to be excommunicated, not executed, and in the following parable, he insists on an unlimited willingness to forgive (from the heart) (Mt 18:21-35). His parable of the weeds among wheat in Matthew 13:24-30 offers another lesson against capital punishment. In response to the servants’ request to pull up the weeds, the master replies: “No, if you pull up the weeds you might uproot the wheat along with them. Let them grow together until harvest...”⁴

Finally, there is Jesus’ great act of sacrifice on the cross. When God came to dwell among us, he did not slay all the wicked sinners. Instead, like an innocent victim lamb, he laid down his life in their stead (1 Pt 3:18, Rom 5:6-8, 2 Cor 5:21, and Hebrews 7-10).

Although there are verses in Sacred Scripture which condone the death penalty at least in certain circumstances, the fullest development of God’s revelation of his will shows us that he does not “find pleasure in the death of the wicked” (Ez 18:23). “For God did not send his Son into the world to condemn the world, but that the world might be saved through him” (Jn 3:17).

HUMAN DIGNITY AND CATHOLIC TEACHING

Beyond the basic orientation toward mercy in the teachings of Jesus, the essentials of our current Catholic teaching on capital punishment come from St. John Paul II's encyclical, *Evangelium Vitae* (The Gospel of Life), written over thirty years ago in 1995. The portion on capital punishment is one piece of the overall message of the encyclical, which is that both natural law and divine revelation teach us that every human life has intrinsic value, giving rise to a unique, God-given dignity. As St. John Paul II wrote, "...every person sincerely open to truth and goodness can, by the light of reason and the hidden action of grace, come to recognize in the natural law written in the heart (cf. Rom 2:14-15) the sacred value of human life from its very beginning until its end, and can affirm the right of every human being to have this primary good respected to the highest degree."⁵

Right in the introduction, St. John Paul II reflects on the story of Cain and Abel. The punishment for Cain of course teaches that an innocent person may not be killed, but it also teaches something about the dignity that persists even in the guilty:

And yet God, who is always merciful even when he punishes, "put a mark on Cain, lest any who came upon him should kill him" (Gn 4:15). He thus gave him a distinctive sign, not to condemn him to the hatred of others, but to protect and defend him from those wishing to kill him, even out of a desire to avenge Abel's death. *Not even a murderer loses his personal dignity*, and God himself pledges to guarantee this.⁶

The pope addressed the death penalty in a chapter on the fifth commandment and related passages in Sacred Scripture. He recognizes that in some circumstances, as for example when defending oneself or the innocent from unjust attack, it is necessary to use force—even lethal force—against the aggressor when there is no other way to incapacitate him.

This papal teaching is clear and concise enough to be worth restating here in full:

This is the context in which to place the problem of the death penalty. On this matter there is a growing tendency, both in the Church and in civil society, to demand that it be applied in a very limited way or even that it be abolished completely. The problem must be viewed in the context of a system of penal justice ever more in line with human dignity and thus, in the end, with God's plan for man and society. The primary purpose of the punishment which society inflicts is "to redress the disorder caused by the offence." Public authority must redress the violation of personal and social rights by imposing on the offender an adequate punishment for the crime, as a condition for the offender to regain the exercise of his or her freedom. In this way authority also fulfils the purpose of defending public order and ensuring peoples safety, while at the same time offering the offender an incentive and help to change his or her behavior and be rehabilitated.

It is clear that, for these purposes to be achieved, the nature and extent of the punishment must be carefully evaluated and decided upon, and ought not go to the extreme of executing the offender except in cases of absolute necessity: in other words, when it would not be possible otherwise to defend society. Today however, as a result of steady improvements in the organization of the penal system, such cases are very rare, if not practically non-existent.

In any event, the principle set forth in the new Catechism of the Catholic Church remains valid: "If bloodless means are sufficient to defend human lives against an aggressor and to protect public order and the safety of persons, public authority must limit itself to such means, because they better correspond to the concrete conditions of the common good and are more in conformity to the dignity of the human person."⁷

In other words, given the effectiveness of current means of incarceration, there is no morally sound or commensurate reason for recourse to capital punishment, since it is no longer necessary to protect public safety and serves no other morally legitimate purpose. Indeed, its continued application then becomes morally detrimental to the society in which it is applied.

REPEATED PAPAL AFFIRMATIONS

Four years after issuing *Evangelium Vitae*, at a papal Mass in St. Louis, MO, St. John Paul II stated that “a sign of hope” of the new evangelization, which calls followers of Christ to be unconditionally pro-life, “is the increasing recognition that the dignity of human life must never be taken away, even in the case of someone who has done evil,” and then renewed his call “for a consensus to end the death penalty, which is both cruel and unnecessary.”

Pope Benedict XVI and Pope Francis subsequently reaffirmed this teaching of the inadmissibility of the death penalty and called for its end. Pope Francis even revised the *Catechism of the Catholic Church* (2267) to reflect the Church’s official opposition to it, and strongly support efforts to end its use, in these words:

Consequently, the Church teaches, in the light of the Gospel, that “the death penalty is inadmissible because it is an attack on the inviolability and dignity of the person,” and she works with determination for its abolition worldwide.

Pope Leo XIV has repeated the appeal of his predecessors, declaring in an interview that “someone who says I’m against abortion but is in favor of the death penalty is not really pro-life.” Most recently, in a video message to mark the fifteenth anniversary of the abolition of the death penalty in Illinois, the pope declared: “I likewise offer my support to those who advocate for the abolition of

the death penalty in the United States of America and around the world.”⁸

A DEVELOPMENT IN CHURCH TEACHING

Some may be concerned about the mere fact of change. If truth is objective, something cannot be right on one day and wrong on the next. Yet while this is true, from our Catholic faith perspective, it is not surprising that we have come to a deeper awareness of and appreciation for the value of human life and inviolability of human dignity through time and from experience, and in a way that enables us to recognize the inadmissibility of capital punishment in our current context.⁹ We have come to similar insights with regard to slavery,¹⁰ although it was sanctioned in some form in the Bible, not to mention developments in “natural” sciences such as medicine, astronomy, biology, etc. It has always been the case that with the passage of time and growth in understanding, the Church can gain greater insight into the truths revealed in Scripture and transmitted through history with the help of the Holy Spirit. As Vatican II teaches,

The tradition that comes from the apostles makes progress in the church, with the help of the Holy Spirit. There is a growth in insight into the realities and the words that are being passed on. This comes about through the contemplation and study of believers, who ponder these things in their hearts (Lk 2:19, 51). It comes about from the intimate sense of spiritual realities which they experience. And it comes from the preaching of those who, on succeeding to the office of bishop, have received the sure charism of truth. Thus, as the centuries go by, the church is always advancing towards the plenitude of divine truth...¹¹

This describes well the process of how we have come to recognize, especially with the teaching of Pope St. John Paul II, the inadmissibility of capital punishment in our time, despite its sanctioning in the Bible and past Church practice and teaching.

AN ONGOING APPEAL OF THE CATHOLIC BISHOPS

Even before St. John Paul II had expounded this teaching for the universal Church, Catholic bishops in the United States and in Florida had begun to call for an end to the death penalty. They made this appeal not only based on the inviolable dignity of the human person, but also because the death penalty as applied in this country has had many defects of arbitrary and unequal application, and in the past especially was bound up with broader problems of racial discrimination.

Our predecessors in the Florida Catholic Conference issued numerous declarations starting in 1972, after the Supreme Court's decision declared that when arbitrary or discriminatory, capital punishment is unconstitutional as a violation of the Eighth Amendment against "cruel and unusual punishment."¹² The United States Conference of Catholic Bishops (USCCB) has done the same, beginning in 1980 and most recently in their 2017 Statement, *Culture of Life and the Penalty of Death*.¹³

The USCCB statement summarized four main objections to its practice from the perspective of our Catholic faith today:

- The sanction of death, when it is not necessary to protect society, violates respect for human life and dignity.¹⁴
- State-sanctioned killing in our names diminishes all of us.
- Its application is deeply flawed and can be irreversibly wrong, is prone to errors, and is biased by factors such as race, the quality of legal representation, and where the crime was committed.
- We have other ways to punish criminals and protect society.

Even more recently in 2020, then-bishop of the Diocese of St. Augustine Felipe Estévez released his pastoral letter, *Standing Up for the Dignity of All Human Life: A Pastoral Letter on Capital Punishment in Florida*.¹⁵ Bishop Estévez emphasized that Catholic opposition to the death penalty is expressed not only in words but also in action and personal witness through ministry to those on death row, and in the death house, both located in the Diocese of St. Augustine. Such personal witness or testimony, which can lead to conversion and rehabilitation of the criminal,¹⁶ involves ministry to crime victims and their loved ones as well.

In this moment, as state authorities turn to executions as a proportionate punishment which sends a message, and as a significant segment of the public supports the death penalty, we therefore repeat the message of the dignity of every person. The value of the life of the victim demands severe punishment, and the value of other potential victims demands that the guilty be incapacitated. But we are required to remember that "*not even a murderer loses his personal dignity*." We are required to pray for the murderer's repentance and even to desire his good.

As the USCCB stated, opposition to the death penalty is in no way a denial of justice for the victims, or disregard for the deep pain, grief, and anguish of their loved ones. As pastors, we share both the sense of horror and outrage at the terrible crimes and heinous acts of violence committed in many of these capital cases, and deep sympathy and compassion for the loved ones of the victims who are experiencing unspeakable grief, pain, and loss. We agree that the perpetrators of such crimes should be brought to justice, but we disagree that justice is best served by yet another act of killing. The alternative in Florida law to capital punishment is not letting offenders go free; it is life imprisonment without the possibility of parole.

PRACTICAL CONSIDERATIONS: THE COSTS OF CAPITAL PUNISHMENT OUTWEIGH BENEFITS

From historical experience, no study has been able to convincingly show that capital punishment deters murder.¹⁷ According to the Death Penalty Information Center and FBI Uniform Crime Report, states with the death penalty have consistently higher murder rates than those without it. Even in the past ten years, when murder rates have declined nationwide, and last year (2025) when they declined significantly,¹⁸ still they have remained consistently lower in non-death penalty states than in states with the death penalty.¹⁹

The lack of evidence for a deterrent effect is apparent not only in crime statistics here in our country but also in comparison with those of other countries. Our nation remains the only Western industrialized nation where capital punishment is legal, and yet the murder rate in the U.S. is significantly higher than in Canada and western Europe.²⁰ There are various reasons for this, but the results discredit the claim that the death penalty deters violent crimes like murder.

Along with its apparent ineffectiveness as a violent crime deterrent, the death penalty is also more expensive than life in prison without parole. When prosecutors seek the death penalty, far more funds are required at the state and local level just for the trial itself. After a defendant is convicted, the constitutionally required appeals process—which even most serious proponents of the death penalty accept as necessary to ensure against wrongful executions—continues to cost the state enormous sums over many decades. Perhaps surprisingly to some, keeping the death penalty legal, far from saving the state money, costs the state far more than life imprisonment, while diverting resources from more effective means of law enforcement.²¹

One other practical consideration is that the flaws and imperfections in the criminal justice system have resulted in a death sentence for many who

are innocent. This is a special concern in Florida, which has the highest number of death row inmates who have been exonerated of any state, some after decades in prison.²² That so many were wrongly sentenced though innocent cannot but raise the doubt of whether any of the 133 people Florida has put to death since 1979 were innocent. Our call to end the death penalty is also an effort to prevent this ultimate miscarriage of justice.

Rather than promoting life by deterring homicides, the death penalty promotes a culture of death by declaring that we can improve society by bringing about the death of a human being in our names. Consequently, Florida and other death penalty states in our country continue to spend more to achieve less.

CONCLUSION

Supporters of capital punishment tend to see it as a form of just retribution, as well as closure for the loved ones of victims, who have suffered unspeakable pain, grief, and loss, often extended through the length of the appeals process. But there is a danger that desire for retribution can also degenerate into a simple desire for vengeance, which violates justice. Consequently, it is not always the case that loved ones feel a sense of closure, or even that justice is done with the killing of the killer; some feel quite the opposite:

No one in our family ever wanted to see the killer of our brother and his wife put to death. We felt instinctively that vengeance wouldn't alleviate our grief. We wanted this murderer in prison so he could never hurt another person. But wishing he would suffer and die would only have diminished us and shriveled our souls. Hatred doesn't heal. Every time the state kills a person, human society moves in the direction of its lowest, most base, urges. We don't have to make that choice.²³

In the end, while supporters of capital punishment – who may consider themselves pro-life – claim that it

serves a presumed good of justice for the victims and their loved ones, it comes at a much greater expense to the common good of society, and our common humanity. Instead, as with Jesus' reinterpretation of the *lex talionis* in the context of his Sermon on the Mount, we are called to a higher justice as Christians and a better justice as human beings for our common good and dignity.

In closing, let us again listen to the words of the *Catechism of the Catholic Church* (2267):

Consequently, the Church teaches, in the light of the Gospel, that “the death penalty is inadmissible because it is an attack on the inviolability and dignity of the person,” and she works with determination for its abolition worldwide.

We do work with determination for its abolition, and we urge all Catholics, and our fellow citizens of good will, to end the practice of capital punishment in our state. As we do so, we make our own the prayer of Bishop Estévez in his pastoral letter, imploring God that the ethic of human dignity will infuse every element of society with respect for persons – from the most innocent unborn child to convicted felons – through people of faith transformed by the Gospel message of Christ's love and life.

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ENDNOTES

1 *Dei Verbum*, 7.

2 See especially, Dale S. Recinella, *The Biblical Truth About America's Death Penalty* (Boston: Northeastern University Press, 2004), chs. 4-5, pp. 37-57.

3 Lv 20:10 and Dt 22:22 prescribe death, and Dt 22:23-24 prescribes stoning for a betrothed virgin.

4 It is true that St. Thomas Aquinas draws the contrary lesson of this parable in his *Summa Contra Gentiles* III.146.9 and *Summa Theologiae* II-II 64.2. in which he reasons that the condemned “have at the critical point of death the opportunity to be converted to God through repentance,” and if they fail to do so, “it is possible to make a highly probable judgment that they would never come away from evil....” However, it is clear in context that his main justification for capital punishment rests on the premise that the criminal poses a mortal threat to society. In other words, granted that the gangrenous limb is killing the organism, the objection that it might yet be healed is “frivolous.” Now that other means exist to prevent that mortal threat, the possibility of repentance becomes a non-frivolous reason.

In addition to Cain and Moses in the Old Testament, the Apostle Paul is an example of why it is best not to uproot the weeds prematurely with capital punishment, but instead to follow the way of Christ's justice and mercy. Although he was not directly involved in the stoning of Stephen, Paul clearly consented to and supported it (Acts 7:58, 8:1). But because of the Lord's mercy, St. Paul experienced conversion and became one of the most important apostles for the spread of the gospel and faith of the Church, even today.

5 John Paul II, Encyclical Letter *Evangelium Vitae*, no. 2, available at: https://www.vatican.va/content/john-paul-ii/en/encyclicals/documents/hf_jp-ii_enc_25031995_evangelium-vitae.html.

6 *Evangelium Vitae*, no. 9, emphasis added.

7 *Evangelium Vitae*, no. 56. The quotations are from the *Catechism of the Catholic Church*, paragraphs 2266-2267. Paragraphs 55-56 of *Evangelium Vitae* closely parallel the paragraph 2266-2267 of the Catechism. While the pope's encyclical quoted the initially released 1992 text of the Catechism, the authoritative text (the *editio typica* promulgated in 1997) was expanded to include reference to *Evangelium Vitae*. See the *Catechism of the Catholic Church* (2nd ed.). Washington, DC: Libreria Editrice Vaticana–United States Conference of Catholic Bishops, 2000. See Part 3, Section 2, Chapter 2, Article 5, The Fifth Commandment: <https://usccb.cld.bz/Catechism-of-the-Catholic-Church2/564/>.

8 “UPDATE: Pope Leo XIV wades into Durbin debate”, *Catholic News Agency* (September 30, 2025), <https://www.catholicnewsagency.com/news/266859/pope-leo-xiv-comments-on-cupichs-plan-to-bestow-award-on-illinois-senator>; Pope Leo's remarks of April 24, 2026, at an event hosted at DePaul University celebrating the 15th anniversary of Illinois' abolition of the death penalty: <https://www.youtube.com/watch?v=TMbhIveDrvQ>.

9 The most detailed and comprehensive account of this development up to St. John Paul II's *Evangelium Vitae* is James J. Megivern, *The Death Penalty: An Historical and Theological Survey* (New York: Paulist Press, 1997).

10 See also Recinella, *The Biblical Truth About America's Death Penalty*, pp. 98-102, on the parallels between biblical support for slavery and capital punishment in nineteenth century America, concluding on p. 100: “The modern logic of biblically based support for the American death penalty follows the same tack as the biblical logic for defending slavery: the death penalty is present in the Hebrew scriptures, is not expressly prohibited by the Gospels, and is arguably supported by a particular way of interpreting Paul's Epistle to the Romans [13:4] (out of context).” As the DPIC recalls, the history of the death penalty in our country from colonial times “is intertwined with slavery, segregation, and social reform movements.” (<https://deathpenaltyinfo.org/facts-and-research/background/history-of-the-death-penalty>), and therefore, while distressing, it's not surprising that most southern states are pro-death penalty, and they make up the majority of pro-death penalty states in the nation. It is not without reason that the “Bible Belt” is also known as the “death belt” on this issue.

11 Second Vatican Council, Dogmatic Constitution on Divine Revelation *Dei Verbum*, no. 8, available at: https://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_const_19651118_dei-verbum_en.html.

12 Florida Catholic Conference, Statement on Capital Punishment (November 19, 1972), <https://files.ecatholic.com/11291/documents/2026/6/721101capitalpunishment.pdf?t=1780951662000>. See also *Furman v. Georgia* (1972).

13 See a list of statements on the USCCB website: <https://www.usccb.org/committees/domestic-justice-and-human-development/death-penalty-capital-punishment>.

14 This reason echoes something the famous 19th-century former slave and abolitionist Frederick Douglas articulated back in 1858: “instead of repressing and preventing the horrid crime of murder, [capital punishment] really serves, by shocking and blunting the finer and better feelings of human nature, to undermine respect for human life and leads directly to the perpetration of the crime which it would extinguish.” Cited by Megivern, p. 310. The title of the address from which this excerpt is taken is: “Capital Punishment Is a Mockery of Justice.” Cf. “Capital Punishment is a Mockery of Justice: An Address Delivered in Rochester, New York, on October 7, 1858,” in *The Frederick Douglass Papers*, Series One, *Speeches, Debates, and Interviews*, vol. 3: 1855-1863, The Frederick Douglass Papers Project, <https://frederickdouglasspapersproject.com/s/digitaledition/item/8918>.

15 Available at <https://dosafll.com/wp-content/uploads/2024/07/PastoralLetter-DeathPenalty-ENGLISH-FINAL-min.pdf>.

16 Bishop Estévez writes of this in his pastoral letter: “Our pastoral experience in caring for inmates has revealed that many of them have experienced a conversion of heart, and society can benefit from a reunion with their families and re-entry to society” (p. 17).

17 As one criminologist put it, “Whatever the factors are that affect change in homicide rates, they don’t seem to operate differently based on the presence or absence of the death penalty in a state.” See “ABSENCE OF EXECUTIONS: A special report.; States With No Death Penalty Share Lower Homicide Rates,” *The New York Times* (September 22, 2000). This judgment was confirmed by a comprehensive report by the National Research Council of the National Academies, *Deterrence and the Death Penalty* (Washington, D.C.: The National Academies Press, 2012).

18 According to the Council on Criminal Justice, homicides were down 21% from the previous year, and 44% from five years ago (2021) when it had peaked during the pandemic. Other types of violent crime (assault, armed robbery, domestic violence, etc.) were down as well (see: <https://counciloncj.org/crime-trends-in-u-s-cities-year-end-2025-update/>).

19 Though the murder rate has declined in the past decade while the number of executions has increased, one should not conclude that the first is somehow the result of the second, because “during this decade the murder rate in non-death penalty states has remained consistently lower than the rate in states with the death penalty” (<https://deathpenaltyinfo.org/facts-and-research/murder-rates/murder-rate-of-death-penalty-states-compared-to-non-death-penalty-states>).

20 In 2023, the murder rate in the U.S. was approximately three times higher than in Canada (5.7 per 100,000 vs. 1.9), and even higher than in England (1.5 per 100,000), and much higher than in other western European countries such as Ireland (0.65), etc.

21 Pam Quanrud, “What to Know: Costs and the Death Penalty” *deathpenaltyinfo.org* (March 9, 2026): <https://deathpenaltyinfo.org/what-to-know-costs-and-the-death-penalty>; Death Penalty Information Center, *Smart on Crime: Reconsidering the Death Penalty in a Time of Economic Crisis* (2009): <https://files.deathpenaltyinfo.org/documents/pdf/CostsRptFinal.f1560295688.pdf>.

22 According to the Death Penalty Information Center (DPIC), “Florida has had 30 exonerations from death row, more than any other state” (Illinois is second with 23). Information on those exonerations, and more on the death penalty in Florida, is available at: <https://deathpenaltyinfo.org/state-and-federal-info/state-by-state/florida>. Along with the exonerations, the information about the death penalty in our state includes its history, and the number of times its death penalty practices have been ruled unconstitutional by the U. S. Supreme Court.

23 Mary Bosco Van Valkenburg, cited by the USCCB in their Statement, *A Culture of Life*, p. 16.