

DUE TO DECEASED PEOPLE “COMING BACK”¹ TO LIFE, RELIGIOUS BUSINESS MAY BE POORLY AFFECTED

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I. INTRODUCTION

The problem discussed in this Article is that some people seem to come back to life after dying thereby interrupting business.² Businesses may be asked to make exceptions when they do or seem to return.³ If the mainstream Christian religion practiced by the majority in the United States is responsible for

[∞] This Leviathan, “yes, Mr. Azriel.”

¹ “The real glory is being knocked to your knees and then coming back. That’s real glory. Thats [*sic*] the essence of it.” GoodReads, Vince Lombardi, Quotable Quote, <https://www.goodreads.com/quotes/381494-the-real-glory-is-being-knocked-to-your-knees-and>; and “Vince Lombardi Jr.,” QuotesLyfe, https://www.quoteslyfe.com/quote/The-real-glory-is-being-knocked-to-32003#google_vignette.

² G.S. 7B-2902 (2023) shows that the public has an interest in knowing death records.

³ See Melissa McCall, “What is the Uniform Determination of Death Act (UDDA)?,” Find Law (June 7, 2023), <https://www.findlaw.com/healthcare/patient-rights/what-is-the-uniform-declaration-of-death-act-or-udda.html>.

helping people cope with death and finalize it through the legal system and government, for example burial and death certificate, then a counter-religious practice that seems to bring people back from the dead in a manner that interferes with business must not be given protection, giving people a right to do away with Christian traditions.⁴ The counter-religious interference with Christian business, which is perhaps unorganized and like a secular cult, must be caused to conform to Christian standards, generally to aid the practice of normal

⁴ Catholic Health Association of the United States says, "Because reconciliation and anointing grant forgiveness of sins, sacramental reconciliation with the church can be celebrated only by those who lawfully preside over reconciliation, that is, a bishop or a priest." Marlene Weisenbeck, "Canon Law - Anointing of the Sick: The How and Why," Health Progress (Sep.-Oct. 2011), <https://www.chausa.org/publications/health-progress/archive/article/september-october-2011/canon-law---anointing-of-the-sick-the-how-and-why>. See also, Ishani Ghose, "Woman In Coma Wakes Up To Hear Family Reading Her Last Rites But Finds Herself Unable To Tell Them She's Awake," MEAWW (Feb. 22, 2019), <https://meaww.com/woman-stuck-in-coma-heard-family-reading-last-rites>. "She even heard a priest read her last rites which are prayers given to a Catholic person before their death. As reported by The Sun, Bailie spoke to Fabulous Digital and shared, 'I was trying to get their attention... but I couldn't. I thought, 'I'm going to die.' The mother of one had suffered from a version of what is known as 'locked-in syndrome'."

business in America.⁵ Where exceptions apply, they should be granted, but trends to treat the dead as living people should be prevented to allow normal business.⁶

This Article discusses the case of man from an ancient order who disappeared for several years in Section I. His case demonstrates how the system deals with strange situations and why they do not carve out exceptions for people who seem to die and then come back to life. Section II discusses blue laws that prohibit work on the day of rest, Sunday, especially the sale of certain items for carnal purposes.⁷ These laws are discussed to show that

⁵ See Matthew Jarrell, "Will vs. Trust: What's the Difference?," Investopedia (Nov. 1, 2023), <https://www.investopedia.com/articles/personal-finance/051315/will-vs-trust-difference-between-two.asp>. "LGBTQ+ couples could face potential discrimination from outside family members, and without a will, state laws may favor blood relatives over partners." *Id.* "if you are an LGBTQ+ couple," "it may be even more important to ensure your wishes are honored and carried out." *Id.*

⁶ Zahra Mulroy & James Rodger, "Six People Who 'Came Back From The Dead' Reveal What Really Happens When You Die. People Who Reportedly Came Back From The Dead Have Spoken About What Happened, From Speaking To The Dead To A Feeling Of Peace," COVENTRY TELEGRAPH (July 16, 2018), <https://www.coventrytelegraph.net/news/uk-world-news/what-happens-when-you-die-14247676>.

⁷ Genesis 2:2.

Christian traditions affect business in the community, including the collection of money for death rites by the church and government, and that other spiritual groups, including other religions and sects, may not impinge on the general populace's traditions to do business in another way. This section only argues the applicable black letter law on this issue, does not expand unrelated Establishment clause issues, and does not treat in depth freedom of religion, tradition, substantive due process, or other arguments addressing the spirit of the law that may be similarly worded. The next section, Section III, describes how people feel when those believed to be dead are sighted around the community, thus condemns counter-religious forces ousting Christian values, potentially threatening to harm business in American communities; and Section IV concludes that counter-religious maneuvers cannot be allowed to impede business and that unchristian things happening involving a return from the afterlife should be met with a religiously beneficial purpose by the legislature holding Christians responsible for

the rites that have long served to assure people that the deceased are no longer in the community and that their interest in business has concluded.

A. No Service

At common law, in America a person can be said to have died seven years prior, if the person has not been heard from during that time.⁸ The clock begins to run when the communication with that person ends.⁹ It is a group activity and a matter of privacy.¹⁰

The common law bar, which is not absolute, is not the only way that people classify someone as dead.¹¹ A person whose appearance suddenly dramatically changes, a person that does not respond to recollections made by others about his life, a person that causes catastrophes and cannot be contained, a person that claims through gestures,

⁸ Josh Gilliland, “What Happens Legally When the Dead Come Back to Life?,” The Legal Geeks (Mar. 16, 2014), <https://thelegalgeeks.com/2014/03/16/what-happens-legally-when-the-dead-come-back-to-life/>.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

words, writing, or communications that he has died and returned, and a person that claims that he is obligated by a higher power to complete a mission and then retreat to the afterlife may be classified as having come back from the dead.¹²

Common law relates to what people understand as a group.¹³ Common law rules show that each state may have strong tendencies that cannot change.¹⁴ The common understanding is that if a person cannot be contacted, he may be dead, but that generally people should wait awhile before saying the person is dead because even though he seems to have fallen off the face of the Earth, under rare circumstances he may reappear in the future.¹⁵ People share the trouble with this and rarely encounter it, but many

¹² John P. Cunha, “What Are 5 Physical Signs of Impending Death?,” E-Medicine Health, https://www.emedicinehealth.com/what_are_5_physical_signs_of_impending_death/article_em.htm. *See also*, Christopher Griffin, “5 Facts about the Hearsay Rule for Evidence (Pt. 2),” Griffin Defense Law (June 30, 2014), <https://griffindefenselaw.com/5-facts-about-the-hearsay-rule-for-evidence-pt-2/#:~:text=This%20means%20that%20gestures%20like%20nodding%20or%20shaking,response%20to%20questions%20about%20a%20defendant%20or%20crime>.

¹³ UDDA (2023).

¹⁴ *Id.*

¹⁵ *Id.*

Americans have said that it happens around the world.¹⁶

Common law states that people who die should be laid to rest, memorialized, removed from the system, etc., because encounters with the undead may result when the remains continue to act like living people.¹⁷ People encountering the active remains of people they use to know, may not be complex enough to determine or explain why and how the remains are still active.¹⁸ People say that when others die they instantly believe from their connections to them and from the evidence that they have died; and when they reenter their lives, even shortly thereafter, they feel like they are dealing with the undead.¹⁹ Sometimes, those formerly deceased

¹⁶ *Id.*

¹⁷ "On the religious front, the Vatican has been loosening the rules on cremation since the 1960s. Today, practicing Catholics are allowed to choose cremation; however, the church still wants a ceremony and for the ashes to be buried, not scattered." Sandee LaMotte, *Cremation Has Replaced Traditional Burials in Popularity in America and People Are Getting Creative with Those Ashes*, CNN (Jan. 23, 2020), <https://www.cnn.com/2020/01/22/health/cremation-trends-wellness/index.html>.

¹⁸ *Id.*

¹⁹ Kathryn Knight, "Can Your Sixth Sense Tell When a Loved One Has Died Miles Away? It's Something Many of Us Suspect – and Now There's Startling Evidence It Really Happens," MailOnline

people can be questioned and will discuss what has happened.²⁰ Other times, they change their stories.²¹ They may be able to function as they once did, or they may not.²² The trouble usually arises when they cannot function and are believed to be functional.²³ They may disrupt business.

B. Vanishing

If a wife has not seen or heard from her husband in seven years, she is free to claim that he is dead.²⁴

(Dec. 15, 2011), <https://www.dailymail.co.uk/femail/article-2074247/Can-sixth-sense-tell-loved-died-miles-away.html>.

²⁰ Peter Holley, "She Thought Her Husband Was Dead. Police Told Her He Was Living with His New Family in Florida," WASHINGTON POST (Oct. 29, 2016), <https://www.washingtonpost.com/news/true-crime/wp/2016/10/29/she-thought-her-husband-was-dead-police-told-her-he-was-living-with-his-new-family-in-florida/>.

²¹ "Many people's stories change unless they are documented because they are important to all." DeAnna Janes, *Chelsea Clinton Met Her Husband, Marc Mezvinsky, at a Democratic Political Retreat*, Oprah Daily (Mar. 6, 2020)

<https://www.oprahdaily.com/entertainment/a31230430/chelsea-clinton-husband-marc-mezvinsky/>. "Barbra Streisand, Steven Spielberg, and even Oprah also rounded out the guest list." *Id.*

²² *See id.*

²³ *Id.*

²⁴ *In re Estate of Dawson*, 346 So. 2d 386, 391 (Ala. 1977), *Kyser v. McGlinn*, 207 Ala. 82, 92 So. 13 (1921); *Walker v. Walker*, 218 Ala. 16, 117 So. 472 (1928); *Eisenberg v. Stein*, 222 Ala. 576, 133 So. 281 (1931). *See Gilliland*, "What Happens Legally When the Dead Come Back to Life?" (2014).

A New Yorker claimed her husband's \$2,000 life insurance in 1900.²⁵ She sued them nine years after he vanished.²⁶ The practically widowed complainant received \$666.00, but the remainder was held in trust in case his identity could be matched to business affairs, in short, his whereabouts were discovered.²⁷ The story goes that after twelve days the terms of the provident agreement proved true, her husband was reported to be alive.²⁸

The man's life was not viewed according to family law in this case, but business law.²⁹ Obviously, it would not be guided by religious freedom doctrines either.³⁰ The problem at bar results when any people behave like they are dead

²⁵ *Sears v. Grand Lodge A. O. U. W.*, 163 N.Y. 374 (N.Y. 1900). Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

²⁶ *Sears v. Grand Lodge*, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

²⁷ *Sears v. Grand Lodge*, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

²⁸ *Sears v. Grand Lodge*, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

²⁹ *See*, Cal Fam Code § 2201 (2014). *Sears v. Grand Lodge*, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

³⁰ Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

and are not; or when any people behave like they are alive and they are not.³¹

II. SLIP AWAY

A. Map

This Section asks “Does religion affect business the same way today as it did when this case, *Braunfeld v. Brown*, was decided?”³² The issue is whether the facts in 1961 would lead the court to apply the same rule.³³ Here, it is asked, “How did it affect business?”³⁴ Case law is the rule. “What

³¹ *But see*, Justia, “Abandonment Leading to Legal Termination of Parental Rights,” [³² *Braunfeld v. Brown*, 366 U.S. 599 \(1961\).](https://www.justia.com/family/adoptions/termination-parental-rights/abandonment/#:~:text=Generally%2C%20there%20needs%20to%20be%20a%20period%20of,father%20learns%20of%20the%20existence%20of%20the%20child.(one%20year,%20abandonment);%20Abandonment,%20Law%20Cornell,https://www.law.cornell.edu/wex/abandonment.(One%20year%20in%20New%20York%20for%20an%20abandoned%20case);Cathy%20Caridi,%20Can%20a%20Catholic%20Remarry%20When%20a%20Spouse%20Is%20Missing%20Presumed%20Dead,%20Canon%20Law%20Made%20Easy%20(June%2025,%202015),https://canonlawmadeeasy.com/2015/06/25/can-a-catholic-remarry-when-a-spouse-is-missingpresumed-dead;Bret%20Colson,%20Marital%20Abandonment%20and%20Divorce:%20The%20Definitive%20Guide,%20Survived%20Divorce,https://www.survivedivorce.com/spousal-abandonment-divorce.”</p></div><div data-bbox=)

³³ *Id.*

³⁴ *Id.*

religion was it and what religion is this?”³⁵ An analysis of spooky circumstances helps apply the rule.³⁶ “What is the effect today?” A conclusion can be made that the effects are impermissible. Closing the argument persuasively raises the question “Will it continue to affect business?” The answer must be “no.”

B. Friday

A state may make any rational law that is reasonably related to a legitimate legislative goal.³⁷ *Williamson v. Lee Optical* held that state lawmakers only need a rational basis for a law restricting business.³⁸ The law must be reasonably related to the legislative goal.³⁹ In Illinois for example, authorities prohibit the sale of motor vehicles on Sunday occasionally to limit religious/nonreligious activity

³⁵ *Id.*

³⁶ *Id.*

³⁷ *Williamson v. Lee Optical Co.*, 348 U.S. 483 (1955).

³⁸ *Id.*

³⁹ *Id.*

in cars on the holy day.⁴⁰ Reasons may be numerous.⁴¹

A blue law case is *Braunfeld v. Brown*.⁴² The facts are that Orthodox Jews complained that a Sunday restriction on business reduced their business to five-days-a-week because they closed on Saturdays to honor the Jewish tradition of keeping the Sabbath.⁴³ The issue, “Can a Jewish-owned business complain that the lawmaker closes the business on Sundays?,” was answered as “no.”⁴⁴ It was decided using a black letter rule allowing more state governance.⁴⁵ A law closing business on Sundays does not discriminate against religions that observe the Sabbath on Saturday.⁴⁶

⁴⁰ 625 ILCS 5/5-106 (2024).

⁴¹ IS AMERICA A CHRISTIAN COUNTRY? Sunday Closing Laws vs. Sabbath Observing Jews Meyer Kramer Tradition: A Journal of Orthodox Jewish Thought Vol. 4, No. 1 (FALL 1961), pp. 5 <https://www.jstor.org/stable/23255409>. The Random History of Blue Laws in the United States Larry Holzwarth - January 8, 2020, <https://historycollection.com/the-random-history-of-blue-laws-in-the-united-states/#5-blue-laws-affecting-commerce-were-based-on-injunctions-from-the-old-testament>.

⁴² *Braunfeld*, 366 U.S. 599.

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*

The analysis is that businesses cannot work on Sundays if the law forbids it.⁴⁷ The law may close businesses to maintain the tradition of observing Sunday as a day of rest.⁴⁸ A business owner can choose to observe it on Saturday, but cannot complain that business is lost on Sunday, a forced day closed.⁴⁹ Businesses cannot complain about a second day of rest.⁵⁰ In conclusion, Jewish-owned businesses must conform to the law.⁵¹

Law in America is to help majority-run communities to do business, including keeping customs, such as a day of rest that pertains to them as Christians. The government does not impose a denomination or discriminate by preventing non-Christians from doing business on their day of rest under blue laws, but may under nonprofit, religious freedom, family, criminal, and other laws.⁵² *Groff v. DeJoy* stands for people seeking more religious

⁴⁷ *Id.*

⁴⁸ *Braunfeld*, 366 U.S. 599.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *McGowan v. Maryland*, 366 U. S. 420 (1961).

freedom from employers, not stricter work terms, currently. ⁵³ *Two Guys v. McGinley* held Sunday closing is allowed.⁵⁴

Applying the law to the matter at bar, the government may support religious business. Nearly all people die only once; and their deaths, wills, and remains are documented, processed, and pronounced.⁵⁵ However, a few deaths may be different for some people when brief moments matter, such as the case of a dead celebrity sighting.⁵⁶ The celebrity was buried and the grave was marked, but the person continues to interact with fans.⁵⁷ The results may damage business.⁵⁸

⁵³ Groff v. DeJoy, 600 U.S. 447 (2023).

⁵⁴ "The 1959 Act does not violate the Equal Protection Clause of the Fourteenth Amendment." *Two Guys v. McGinley*, 366 U.S. 582 (1961) at Syllabus, number 4.

⁵⁵ *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), *but see* Hua Hsu, "Why Tupac Never Died," *THE NEW YORKER* (Oct. 23, 2023), <https://www.newyorker.com/magazine/2023/10/30/tupac-shakur-the-authorized-biography-book-review>.

⁵⁶ *Id.*

⁵⁷ *But see*, Daniel Paperny, "Inheritance, the 'Slayer Rule' and Reaping the Proceeds of Death," *Wel Blog* (Mar. 25, 2019) <https://welpartners.com/blog/2019/03/inheritance-the-slayer-rule-and-reaping-the-proceeds-of-death/>.

⁵⁸ Wayne Ford, "Hundreds Gather at UGA Campus for Vigil to Honor Students Who Died Last Week," *ATHENS BANNER-HERALD* (Feb. 26, 2024)

C. Park Ministry

In *Braunfeld*, the other religion cannot be accommodated or the results would be illegal.⁵⁹ Religion affects business when a business that needs to close on Sundays to rest is forced to open to help religious people do business.⁶⁰ Manifestations of people known or believed to be dead, especially when they influence others or claim benefits, use rites, and try exercise rights, force religious workers to work. The Court held that Sunday closing laws do not force the minority religion to work on their Saturday day of rest, lose money in comparison to businesses that only close one day per week, or switch days of rest to make the difference, but unlike that case, here when religion threatens business, it

<https://www.onlineathens.com/story/news/local/2024/02/26/hundreds-gather-to-honor-students-two-students-at-uga-vigil/72745290007/>.

⁵⁹*Braunfeld*, 366 U.S. 599. See e.g., Philip Kosloski, “This Eucharistic Host Was Filmed Bleeding and Pulsating Like a Heart on Fire,” *Aleteia* (June 17, 2019), <https://aleteia.org/2019/06/17/this-eucharistic-host-was-filmed-bleeding-and-pulsating-like-a-heart-on-fire/>.

⁶⁰ See also, *McCullen v. Coakley*, 573 US 464 (2014). Mark Sherman, “Supreme Court Voids 35-Foot Abortion Clinic Buffer,” PBS (June 26, 2014), <https://www.pbs.org/newshour/nation/supreme-court-voids-35-foot-abortion-clinic-buffer>.

interrupts the clergy's life, and he would be remiss not to work as soon as the entity-like disturbance can be contained.

Counter-religious proponents cannot be allowed to force others to set aside their rights, including longstanding and other rights, and then suffer from irrational events when rational laws reasonably related to a legitimate legislative purpose can help them to maintain business to pronounce those believed to be dead as being deceased and exclude them from social business aspects.⁶¹ Counter-religious occurrences that acknowledge limited entrance by deceased but visible or otherwise detectable person-like forms without limitation

⁶¹ Robert Taibbi, "Narcissist or Just Self-Centered? 4 Ways to Tell," PSYCHOLOGY TODAY (Sep. 23, 2015), <https://www.psychologytoday.com/us/blog/fixing-families/201509/narcissist-or-just-self-centered-4-ways-tell>. The problem is that spiritual manifestations affect others like selfishness. "He is really sorry, but to score points with his date or wife," he has "to repair his image with the guests" acting out his penance during his spiritual appearance. *Id.* "The fine line here is the degree to which" he appears to "seek not only attention but also" "opportunities to turn" "blame" into "a way of thwarting criticism." *Id.* "Divergent traits" "shift" "patterns" to "make deliberate efforts to" make Christian businesspersons "more emotionally generous." *Id.* "Scolding" "curious" "people" "probably" will not be taken "seriously." *Id.*

disturb businesses, for example challenging the effect of money (supposed debt accumulation and spending by the dead and advertising on the dead) and harming with the beguiling presence of recently deceased and reportedly dead workers (repair websites that are unmanned and news websites that are abandoned).⁶² Deceased individuals are not included in calculations about the effect of advertising, marketability, and the number of families.⁶³ They are excluded from motorist analyses and environmental analyses.⁶⁴

⁶² Lauren Silva, "What Is Psychological Projection—And How Does It Impact Mental Health?," FORBES (Nov. 2, 2023), <https://www.forbes.com/health/mind/projection-psychology/>. Like "projection" "in order to avoid social repercussions" "obscuring reality" "instead of feeling bad about himself, he can now feel" "emotionally destabilizing" and intrusive." *Id.* "Severe projection may escalate to paranoid delusions" showing that "others are plotting against them" to interrupt business. *Id.*

⁶³ David Hartman, "Seven Witnessing Styles to Attract People to Christ," MINISTRY (Aug. 2018), <https://www.ministrymagazine.org/archive/2018/08/Seven-witnessing-styles-to-attract-people-to-Christ>. "Invitation--Inviting family, friends, and acquaintances to social events, service projects, culturally relevant seminars, or spiritual events where Jesus and His gospel and truth are introduced." *Id.*

⁶⁴ LJ Suzuki, "Pivoting Out of Distress: 6 Steps to Avoid Catastrophe," MSN (Apr. 2024), <https://www.msn.com/en-us/money/smallbusiness/pivoting-out-of-distress-6-steps-to-avoid-catastrophe/ar-BB114fpQ?ocid=mseedgntp&pc=ASTS&cvid=913f5a1a73544f7ff59e5c9c9cfbd285&ei=18>. "This is a radical shift for businesses that have

Religious beliefs held by business owners allowing dead people to be portrayed as living people in a manner that interrupts business are seeking excessive accommodations and preference.⁶⁵ The state should stop them, for example make counter-religious frauds follows applicable laws, such as those laws already preventing people in park pavilions from praying or summoning then obeying dead criminals' psychically intimated conspiracies against the government (e.g. sociopathic and cultlike gang).⁶⁶ By continuing to allow churches, for

operated at losses for years, but it is essential to survival. This means making hard decisions to ensure sustainability." *Id.*

⁶⁵ See, *Coakley*, 573 US 464.

⁶⁶ Owen Gleiberman, "Charles Manson Changed the World by Making Homicide — and Himself — Part of Popular Culture," VARIETY (2017), <https://variety.com/2017/voices/columns/charles-manson-changed-the-world-1202619410/>. Patti Maguire Armstrong, "Was Charles Manson Possessed by the Devil? Was Manson Possessed? I Asked an Exorcist and a Catholic Psychiatrist Who Works with Exorcists What They Thought," NATIONAL CATHOLIC REGISTER (May 14, 2018), <https://www.ncregister.com/blog/was-charles-manson-possessed-by-the-devil>.

Dr. Richard Gallagher is regularly called upon to help a network of exorcists to evaluate and advise. He was educated and trained at Princeton and Yale, has a private practice, and is on the faculty at Columbia University and New York Medical College. Gallagher has been the longest-standing American attendee at the meetings of the now Rome-based International Association of Exorcists in Italy and for a time the only psychiatrist on its governing board. *Id.*

To discern the difference between possession and mental illness, Gallagher explained that possession is considered when there is a

example, to gather for spiritually replenishing memorial services under the shelter provided by the state it is like saying that the blue laws were fair because nobody other than the Jews did business on Sunday anyway, so the party claiming the disadvantage actually lost nothing when the custom was codified. The businesses had the right to close.

This situation is not one in which a religion resonates with anti-government business values or does not have control, but rather this situation calls for help from the government. There, the Jews were prevented from doing business with each other, but the counter-religious absurdities are unlike either party because the government is unable to regulate this spiritual problem because the returned people are said to go in and out sometimes.⁶⁷ Thus, ripe complaints should be gathered and taken seriously. The state should make it easy for people whose

pattern of symptoms that don't fit a psychiatric profile and often includes paranormal manifestations such as superhuman strength, knowing things that were hidden, speaking a language the person never learned, and even levitation. *Id.*

See e.g. Proverbs 7:1-27.

⁶⁷ *Braunfeld*, 366 U.S. 599.

relatives and friends reappear, do not become a criminal disease (i.e. terrorists), and are legal (e.g. entities) persons with rights in every sense to adjust the status of individuals once believed to be dead like in the case of the insured wife.⁶⁸ The system acknowledges lost people and they should not be blamed for abandonment of property, children, animals, etc.⁶⁹ This problem is not as common as people who believe that they may be sighted after death asking others to hold a place for them in society.⁷⁰ Christian businesspersons do not believe in restored lives, but without strong responses from the

⁶⁸ See *id.* Sears v. Grand Lodge, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

⁶⁹ *Id.* Sears v. Grand Lodge, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

⁷⁰ Enid Nemy, "'What? Me Marry?' Widows Say No," NY TIMES (June 18, 1992), <https://www.nytimes.com/1992/06/18/garden/what-me-marry-widows-say-no.html#:~:text=Many%20widows%20who%20choose%20to%20remain%20single%20have,individual%2C%20rather%20than%20as%20one%20of%20a%20pair.> "As a growing number of people opt for customized family arrangements and life styles, single motherhood being the most publicized of late, another nontraditional pattern is being observed. An increasing number of middle-aged and older widows are choosing not to remarry." *Id. but see* "A very small percentage of widows are probably avoiding remarriage for another reason," "Dr. Gordon Clanton, who teaches sociology at San Diego State University" "said: 'Widows of prominent men may have a large investment in being the widow of that person.'" *Id.*

community, they are not able to overcome the influx of pagan demands (e.g., park ministry) against Christian business practices and beliefs.⁷¹

III. TROUBLE

This Section addresses deaths and disappearances hampering business (e.g., emotional trouble) associated with the possible loss of normal death rites and a final resting place in the community. The trouble is about strange sightings, unusually bleak feelings, and similar otherworldly occurrences. The unusual situation of people who cannot or seem not to be able to rest in peace cannot be permitted through counter-religious activity and inactivity to affect business.⁷² A possible morbid phenomenon

⁷¹ "Our new Constitution is now established, everything seems to promise it will be durable; but, in this world, nothing is certain except death and taxes." National Constitution Center (NCC), "Benjamin Franklin's Last Great Quote and the Constitution (Nov. 13, 2023), <https://constitutioncenter.org/blog/benjamin-franklins-last-great-quote-and-the-constitution>.

⁷² "The Pygmalion and Golem Effects: Expectation and Performance," World of Work (Aug. 2018), <https://worldofwork.io/2019/08/the-pygmalion-and-golem-effects/>. The Pygmalion (or Rosenthal) effect is a phenomenon whereby a leader's expectations of an employee's performance impacts that individual's performance. The name stems from the mythological

affecting business may end with the deceased person's loved ones hiding in shame and avoiding the reappearance of the person perhaps because the person acts erratically, pathetically, treacherously, and without support from the living.⁷³ Support is a vital mechanism for controlling behavior.⁷⁴ It could

Greek sculptor, Pygmalion, who carved a woman and fell so in love with it that she came to life. Just as Pygmalion brought his statue to life, leaders can bring the individuals in their teams to life through belief and expectation. *Id.*

Gary Zabel, "Golem: The History of the Golem," Kabbalah, https://faculty.umb.edu/gary_zabel/Courses/Phil%20281b/Philosophy%20of%20Magic/Arcana/Kabbalah/golem01.shtml.html. "Stories of artificial creations made by Jewish sages appear very early, during the Talmudic era (prior to 500 C.E.). In theological discussions, Adam is described as a golem during the time of his formation, but prior to God blowing life and (more importantly) soul into him." *Id.* Commenting that the golem is not a miracle, monster, or natural, but something entirely apart, Moshe Idel writes, "it is an entity." *Id.*

⁷³ "Human beings need a lot to feel alive. Family. Love. Sex. But we only need one thing to actually be alive. We need a beating heart. When our heart is threatened, we respond in one of two ways. We either run or we attack. There's a scientific term for this. Fight... or flight. It's instinct. We can't control it. Or can we? Joan Rater & Tony Phelan, "Deterioration of the Fight or Flight Response," Grey's Anatomy Fandom (May 15, 2006), https://greysanatomy.fandom.com/wiki/Deterioration_of_the_Fight_or_Flight_Response.

⁷⁴ Tibi Puiu, "Hidden Features in Old Colonial Money Reveal How Ben Franklin Outwitted Counterfeiters and Shaped America's First Currency Story, MSN (Apr. 2024) <https://www.msn.com/en-us/money/markets/hidden-features-in-old-colonial-money-reveal-how-ben-franklin-outwitted-counterfeiters-and-shaped-america-s-first-currency/ar-BB118J6K?ocid=msedgntp&pc=ASTS&cvid=2d11bba95f8744f3cc1197d2678f8136&ei=21>.

become cyclical. The more unavailable to the system the problem is, the less it connects directly to business, yet may cause all the more trouble. If the person suddenly awakes from a missing state, for example, then perhaps he does not need money and does not need money to follow the law, and does need the law to guide him to use his money.⁷⁵

A person may pertain to an ancient order, like the person in the first case, who was insured through his business, yet not receive condonation for his spiritual condition.⁷⁶ Religion does not support the ingress and exit of persons on the highway to heaven.⁷⁷ Once a person dies, it is final.⁷⁸ If a person suddenly

⁷⁵ See, Andrew E. Budson, "How Not to Lose Money Because of Alzheimer's Disease," *Harvard* (Jan. 21, 2021), <https://www.health.harvard.edu/blog/how-not-to-lose-money-because-of-alzheimers-disease-2021012121795>. "Making financial decisions requires the coordinated function of many brain systems in order to retrieve prior information from memory, incorporate new information into memory, keep that information in mind, and analyze it. Individuals with Alzheimer's disease have trouble with the brain systems involved in all of these functions." *Id.*

⁷⁶ *Sears v. Grand Lodge*, 163 N.Y. 374 (1900); Gilliland, "What Happens Legally When the Dead Come Back to Life?" (2014).

⁷⁷ Ben Sisario, "Original or Copied? 'Stairway to Heaven' Is Back in Court," *NY TIMES* (Sep. 22, 2019), <https://www.nytimes.com/2019/09/22/business/media/stairway-to-heaven-copyright-appeal.html>.

⁷⁸ See *Smith v. United States*, No. 20-11365 (11th Cir. 2021).

reappears, he is thought of as being alive.⁷⁹ In a few situations, the problem could be that it is hard to identify people who are said to be someone other than the person they claim to be.⁸⁰ In that case, no one had interacted with him for some time.

While the person may or may not have been or been known to be religious or spiritual, the person's poor effect on business is a reason to hope that religion neatly continues to transfer dead people into a final resting place. Several religions can aid in explaining why the person returned, seems to have returned, or needs something more before ultimately vanishing. Religion is not blamed for it because in the United States it is not commonly associated with religion, it is a strange occurrence. Yet, the events are possibly accompanied by a profound alteration of the living person's view of the deceased, which relates to afterlife beliefs.

When the churches in America confront the issue they may claim that the person seeing the deceased

⁷⁹ *Id.*

⁸⁰ *Id.*

is wrong—and this is a daunting and stifling threat—but often they may use common concepts to assure a person shaken by a bad experience.⁸¹ A Jesuit vocabulary term describes the whole person, *cura personalis*, that can be healed, and, in this Article changed through the removal of demons, an exorcism.⁸² The sightings are not dead people, but are demons that hide the person who is deadened, only revealing the person when the person has an opportunity to atone. The interference is like bad luck that befalls the viewer, something the troubled person who hid, now repaid by the demon, wished to avoid. The suffering is completely contrary to community business standards because the once hidden person has reentered with afflictions harming community dwellers. The once oppressed or possessed person is treated like he is dead instead of a troublemaker and will eventually die, terminally.

⁸¹ CNN (2020).

⁸² Father Glenn J. Comandini, STD, "Mandalas, Mindfulness Are Good But Rosary Is Better," *Catholic Spirit* (June 22, 2019) <https://www.catholicspirit.com/news/mandalas-mindfulness-are-good-but-rosary-is-better>. "Individually or in a group, our minds are drawn to the realm of the supernatural wherein we are free."

The Catholic Church educates practitioners informing them that only highly spiritual people can evaluate a case of a person causing distress due to demonic occupation.⁸³ The demons could embody the remnants of past criminals. In this example, a Christian that ignores the encroachment of the majority's right to have the apparently dead abstain from interrupting business by way of controlling the living and the business realm, including nonprofit businesses, is like a shopkeeper that opens for business on a Sunday because somebody knocked on the door. The proverbial battleground described by Christians, such as Catholics, is not the same as a person laying traps, dying, and then seeming to return from the dead or a person disappearing and then returning to the community at a time and in a manner that is inconsistent with others' expectations and way of life to the extent that it causes problems.⁸⁴ However, the dark problems that the church can fight cannot interrupt a stream of exceptions within

⁸³ See *id.* See also NATIONAL CATHOLIC REGISTER (May 14, 2018).

⁸⁴ See Proverbs 12:13-22.

traditions that are rooted and practiced through these rites. People must continue to rely on simple practices, such as giving last rites to a patient in the hospital, death announcements to relatives, death certificate filed with the state and church, and a formal burial open to the community, including friends and family, in order to maintain the function of business within the community, including money exchanged within the church.

IV. GATHERED HERE

Concluding the argument, Christian communities are allowed to use the law to help business owners protect religious rights, specifically rites, but the rites must be practiced to keep the tradition. Their business should not be affected by strange spiritual, religious, or secular loopholes when they maintain the lowest standard acknowledged by the legislature as having a community-wide benefit. The appearance of people believed to be dead harms business and cannot be allowed to affect individuals,

families, and entities, such as corporations, even though religion may benefit from it and excuse it.