ESSAYS

A FOUNDATION FOR LIBERTY: CELEBRATING THE 250TH ANNIVERSARY OF THE VIRGINIA DECLARATION OF RIGHTS

The Honorable Stephen R. McCullough *

TABLE OF CONTENTS

INTRODUCTION 162
I. CREATION AND OVERVIEW OF THE DECLARATION OF RIGHTS 162
A. *George Mason, the Neglected Founding Father* 163
B. *An Expedited Drafting Process* 164
C. *The Break with the Mother Country Propels a New Approach to Securing Individual Rights* 164
D. *Foundational Virtues Set Forth* 168
II. IMPORTANCE OF THE VIRGINIA DECLARATION OF RIGHTS 168
III. THE UNFINISHED WORK OF THE DECLARATION OF RIGHTS AND OUR DUTY 169
A. *The Founding Generation Crafted an Imperfect Document with the Understanding that Succeeding Generations Would Improve It* 169
B. *The Need to Strengthen Civics Education* 172
CONCLUSION 173

* Justice Stephen R. McCullough is a 1997 graduate of the University of Richmond School of Law. He has served as justice for the Supreme Court of Virginia since 2016. Justice McCullough authored the treatise, Virginia Constitutional Law.

INTRODUCTION

This year marks the 250th anniversary of the founding of our Nation. A wide range of events, from backyard barbecues to formal academic seminars, will celebrate the courage and vision of the founding generation.

In the popular imagination, the Declaration of Independence is the thunderclap that marks the beginning of our journey as an independent nation. That seminal document memorably states that governments are instituted to secure inalienable rights. It does not, however, specify what those rights are. A few weeks before the adoption of the Declaration of Independence, the Virginia Constitutional Convention approved a Declaration of Rights that delineated some of these inalienable rights.[1]

The adoption of the Virginia Declaration of Rights was a watershed moment in the history of the United States. It deserves to be celebrated alongside the Declaration of Independence for its pivotal role in fashioning a new Republic devoted to the protection of individual liberty and to the rule of law. The founding generation intended to create something different—a new order for the ages.[2] The protection of individual liberty lies at the heart of this new order.

I. CREATION AND OVERVIEW OF THE DECLARATION OF RIGHTS

Once the crisis with the English monarchy reached a point of no return, the colony of Virginia assembled a Constitutional Convention to establish a new government. By resolution dated May 15, 1776, the Convention appointed a committee to draft a Declaration of Rights. George Mason was to be its primary author.

1. *The Virginia Declaration of Rights*, NAT'L ARCHIVES, https://www.archives.gov/founding-docs/virginia-declaration-of-rights [https://perma.cc/RV3Y-6G7Y].

2. "Novus Ordo Seclorum," Latin for a "New Order for the Ages," is one of our national mottos. It can be found on the reverse side of the Great Seal of the United States. *See* Jessie Kratz, *The Great Seal: Celebrating 233 Years of a National Emblem*, NAT'L ARCHIVES: PIECES OF HIST. (June 20, 2015), https://prologue.blogs.archives.gov/2015/06/20/the-great-seal-celebrating-233-years-of-a-national-emblem/ [https://perma.cc/S37N-6BDR].

A. *George Mason, the Neglected Founding Father*

Virginians played an outsize role in the founding of our nation: George Washington became a revered figure through his steadfast command of the army during the revolution and for the example he set as the Nation's first President; Thomas Jefferson ensured his everlasting fame by, among many other accomplishments, authoring the Declaration of Independence and serving as President; James Madison secured his place in history with his bold plan for a new constitution and, of course, attaining the Presidency, as well; John Marshall later rose to fame as a brilliant Chief Justice; and Patrick Henry is remembered for his powerful oratory and unwavering defense of liberty.

George Mason has not attained the same levels of fame as other prominent Virginians of the era. This relative obscurity is likely due in no small part to the fact that Mason "loathed routine legislative tasks and had no stomach for any sort of political intrigue."[3] Nevertheless, at the time of the founding, he was viewed with great respect by the leading Virginians of his time. Pulitzer Prize winning historian Dumas Malone observes that Mason was "constantly consulted by other leaders" and describes Mason as an "honored prophet."[4] For his part, Thomas Jefferson regarded him as "a man 'of the first order of greatness.'"[5] "Jefferson described Mason as 'a man of the first order of wisdom among those who acted on the theatre of the Revolution, of expansive mind, profound judgment, cogent in argument, learned in the lore of our former constitution, and earnest for the republican change on democratic principles.'"[6]

Mason was not a lawyer. Nevertheless, his classical education, his knowledge of colonial charters, the rights of Englishmen, and the English constitution made him an obvious candidate to serve as the primary draftsman of the Declaration of Rights.[7]

---

3. Dumas Malone, *Foreword* to ROBERT A. RUTLAND, GEORGE MASON RELUCTANT STATESMAN, at vii, viii (La. State Univ. Press 1989).

4. *Id.* at viii–ix.

5. *Id.* at x.

6. *Id.*

7. ROBERT A. RUTLAND, GEORGE MASON: RELUCTANT STATESMAN 49 (La. State Univ. Press 1989).

B. *An Expedited Drafting Process*

Over the span of a few weeks, Mason drafted and circulated a ten-point Declaration to the Committee. The Committee did not disturb the essential particulars of Mason's draft. It made some additions, such as adding Section 7, which prohibited the executive from suspending laws,[8] and Section 15, which sets out cardinal virtues essential to the smooth functioning of a republic.[9]

The Committee then presented the draft to the Convention. The most significant change to Mason's draft came from James Madison, who altered Mason's original language on the topic of religious freedom. Mason's draft provided, in relevant part, that "all men should enjoy the fullest toleration in the exercise of religion, according to the dictates of conscience, unpunished and unrestrained by the magistrate, unless, under colour of religion, any man disturb the peace, the happiness, or safety of society."[10] Madison believed that the language of "toleration" was too cramped. His more expansive version, adopted by the Committee, provided that "all men are equally entitled to enjoy the free exercise of religion, according to the dictates of conscience, unpunished and unrestrained by the magistrate, [u]nless the preservation of equal liberty and the existence of the State are manifestly endangered . . ."[11]

Less than four weeks after the Committee was appointed to prepare a draft, the final version passed the Convention on June 12, 1776.[12] Three weeks later, the Continental Congress adopted the Declaration of Independence.

C. *The Break with the Mother Country Propels a New Approach to Securing Individual Rights*

Great Britain had a constitution, but it was an unwritten one. Parliamentary supremacy—which included the right to alter the

8. BRENT TARTER, CONSTITUTIONAL HISTORY OF VIRGINIA 50–51 (Paul Finkelman, Timothy S. Huebner & Charles Zeldon eds., 2023).

9. *Id.* at 52.

10. George Mason, *First Draft of the Virginia Declaration of Rights* ¶ 16, *in* 1 THE PAPERS OF GEORGE MASON 276, 278 (Robert A. Rutland ed., 1970).

11. James Madison, *Madison's Amendments to the Declaration of Rights (29 May–12 June 1776)*, NAT'L ARCHIVES: FOUNDERS ONLINE, https://founders.archives.gov/documents/Madison/01-01-02-0054-0003 [https://perma.cc/DL88-NAQM].

12. RUTLAND, *supra* note 7, at 56.

unwritten constitution—meant that those rights might be subject to revision. By setting down specific, unalterable rights, the Virginia Declaration of Rights sought to protect citizen rights from governmental intrusion for ages to come. In the words of the preamble, the rights specified in the Declaration formed the "basis and foundation of government" for "the good people of Virginia" as well as "their posterity."[13] As one Virginian memorably put it, "a constitution is framed for ages to come, and is designed to approach immortality as nearly as human institutions can approach it."[14]

It is worth noting that, unlike the drafters of the United States Constitution, the drafters of the Virginia Declaration of Rights crafted a Declaration of Rights *first*, before proceeding to adopt a constitution that set forth the architecture of government.

Drawing from enlightenment thought and landmark documents such as Magna Carta and the English Bill of Rights of 1689, the Declaration of Rights enumerated "inherent rights"[15] and laid the philosophical foundation for a government that would later be memorably characterized as "of the people, by the people, for the people."[16]

A Sea Change on the Question of Sovereignty. In England, the king or queen is the sovereign, the fountainhead of governmental authority. The Declaration of Rights unambiguously repudiates this concept, stating that all "power is, by God and nature, vested in, and consequently derived from, the people; that magistrates are their trustees and servants, and at all times amenable to them."[17] Offering a preview of some of the language of the Declaration of Independence, the Virginia Declaration of Rights asserted

> [t]hat all men are by nature equally free and independent and have certain inherent rights, of which, when they enter into a state of society, they cannot, by any compact, deprive or divest their posterity; namely, the enjoyment of life and liberty, with the means of acquiring and possessing property, and pursuing and obtaining happiness and safety.[18]

13. VA. DECLARATION OF RIGHTS pmbl. (1776).
14. Cohens v. Virginia, 19 U.S. 264, 287 (1821) (opinion for the Court by Marshall, C.J.).
15. VA. CONST. art. I, § 1.
16. Abraham Lincoln, Gettysburg Address (Nov. 19, 1863).
17. VA. DECLARATION OF RIGHTS § 2 (1776).
18. *Id.* § 1.

As if that were not enough, the Declaration goes on to state "[t]hat government is, or ought to be, instituted for the common benefit, protection, and security of the people, nation, or community."[19] Government is not instituted for the pleasure or glorification of a king or any other single person.

Separation of Powers. The United States Constitution does not expressly mention the doctrine of separation of powers. The Declaration of Rights does. It provides "[t]hat the legislative and executive powers of the state should be separate and distinct from the judiciary."[20] At first blush, it may seem odd to place a provision requiring the separation of powers in a Declaration of Rights. It is not an individual right. The doctrine of separation of powers, however, is a structural protection for individual rights. In Federalist 47, James Madison wrote that "[t]he accumulation of all powers, legislative, executive, and judiciary, in the same hands, whether of one, a few, or many, and whether hereditary, self-appointed, or elective, may justly be pronounced the very definition of tyranny."[21]

Civil Rights. The Declaration of Rights protects freedom of the press, declaring it to be "one of the great bulwarks of liberty."[22] Mindful of the centuries of religious persecution and warfare in Europe, the Declaration of Rights provides "[t]hat religion, or the duty which we owe to our Creator, and the manner of discharging it, can be directed only by reason and conviction, not by force or violence; and therefore all men are equally entitled to the free exercise of religion, according to the dictates of conscience."[23] It also secured the right to trial by jury, describing it as "preferable to any other" and as something "sacred."[24]

Protections for Persons Accused of Committing a Crime. For persons accused of a crime, the Declaration of Rights secures the "right to demand the cause and nature of his accusation," the right to confront accusers and witnesses, the right to present evidence, the right to a speedy trial, the right to trial by an impartial jury whose verdict must be unanimous, the right against self-

19. *Id.* § 3.
20. *Id.* § 5.
21. THE FEDERALIST NO. 47, at 301 (James Madison) (Clinton Rossiter ed., 1961).
22. VA. DECLARATION OF RIGHTS § 12 (1776).
23. *Id.* § 16.
24. *Id.* § 11.

incrimination, and the provision that no one can lose their liberty except by the law of the land: arbitrary, lawless action will not be tolerated.[25] The Declaration of Rights also prohibited excessive bail and fines, and forbade cruel and unusual punishments.[26] It banned the hated practice by the colonial authorities of issuing general warrants, which authorized the seizure of persons or goods without proper suspicion or without naming the person to be arrested.[27]

Danger Presented by Rogue Generals. Military coups are a distressingly common feature of human history, from Julius Caesar to Napoleon to countless examples in modern times. Section 13 addresses the threat that standing armies could pose to a republic, stating that standing armies in times of peace were "dangerous to liberty," and that "in all cases the military should be under strict subordination to, and governed by, the civil power."[28] The proper defense of a state, the Declaration states, is "a well-regulated militia, composed of the body of the people, trained to arms."[29]

Repudiation of Certain British Customs. Finally, the Declaration of Rights sought to ban practices and customs from the mother country that the leaders of the movement for independence found abhorrent. First, they ensured that there would be no hereditary aristocracy. Section 4 provides that "no man, or set of men, is entitled to exclusive or separate emoluments or privileges from the community, but in consideration of public services; which, nor being descendible, neither ought the offices of magistrate, legislator, or judge to be hereditary."[30] Echoing the English Bill of Rights, which prohibited the King from suspending laws without the consent of Parliament, the Declaration of Rights forbids the executive from "suspending laws, or the execution of laws, by any authority, without consent of the representatives of the people."[31] Section 6 of the Declaration of Rights specifies that elections "ought to be free," a direct response to the practice of English kings who frequently interfered with elections to secure a pliable parliament.[32]

---

25. *Id.* § 8.
26. *Id.* § 9.
27. *Id.* § 10.
28. *Id.* § 13.
29. *Id.*
30. *Id.* § 4.
31. *Id.* § 7.
32. *Id.* § 6; Bertrall L. Ross II, *Challenging the Crown: Legislative Independence and the Origins of the Free Elections Clause*, 73 ALA. L. REV. 221, 227 (2021).

D. *Foundational Virtues Set Forth*

Most of the text of the Declaration of Rights is devoted to the articulation of concrete personal rights. In addition to those clauses, which can be vindicated in a court of law, the Declaration of Rights sets forth broad conceptual points which are also significant, even if they are not meant to be justiciable:

"That no free government, or the blessings of liberty, can be preserved to any people but by a firm adherence to justice, moderation, temperance, frugality, and virtue and by frequent recurrence to fundamental principles."[33]

Political leaders and citizens alike in our day would benefit from a return to these cardinal principles.

II. IMPORTANCE OF THE VIRGINIA DECLARATION OF RIGHTS

The Virginia Declaration of Rights marked a turning point in the relationship between the citizen and the government. The Supreme Court of Virginia has rightly called the Declaration of Rights a "great charter of freedom."[34] A prominent scholar describes the importance of the Virginia Bill of Rights:

> The modern world's attachment to liberty and to Bills of Rights in general dates back to the adoption of The Virginia Declaration of Rights by a state constitutional convention in Virginia, on June 12, 1776 . . . [.] This Virginia Declaration of Rights also predated the Virginia Constitution itself, which was adopted on June 29, 1776. The Virginia Declaration of Rights inspired many of the other rebellious colonies to adopt similar Declarations of Rights of their own. It also inspired Thomas Jefferson in drafting the similar U.S. Declaration of Independence, which was published on July 4, 1776, and it inspired James Madison in writing the U.S. Bill of Rights in 1789. Perhaps even more surprisingly, the Virginia Declaration of Rights actually inspired the Marquis de Lafayette in writing the French Revolutionary Declaration of the Rights of Man and of the Citizen of 1789, a document of enormous importance throughout the world. It is not an exaggeration to say that the Virginia Declaration of Rights

33. VA. DECLARATION OF RIGHTS § 15 (1776).

34. Smoot v. People's Perpetual Loan & Bldg. Ass'n, 95 Va. 686, 690, 29 S.E. 746, 747 (1898).

> fundamentally changed the relationship between individuals and their governments all over the world.[35]

Leonard Levy, in his seminal work on the Bill of Rights, notes that "the Virginia Declaration of Rights became one of the most influential constitutional documents in American history."[36] The Virginia Declaration of Rights "is the *Magna Charta* of Virginia, and, in a sense, of America. It first announced the great principles for which the colonies were to contend in the approaching struggle, and remains to this time the bedrock of republican government."[37]

There is a direct line between the freedoms we enjoy under the United States Constitution and those first articulated in the Declaration of Rights. It fell to a Virginian, James Madison, to craft what became the Bill of Rights. Madison, naturally, drew extensively from what he knew best: the Virginia Declaration of Rights.

It is worth remembering that the Bill of Rights of the United States Constitution was not effective until 1789. Even with the adoption of the Bill of Rights, those protections were not extended to the States until after the Civil War and the ratification of the Fourteenth Amendment.[38] For much of Virginia's history as a Commonwealth, then, the Declaration of Rights protected the rights of Virginians.

III. THE UNFINISHED WORK OF THE DECLARATION OF RIGHTS AND OUR DUTY

A. *The Founding Generation Crafted an Imperfect Document with the Understanding that Succeeding Generations Would Improve It*

Although we rightly cherish the legacy that we were bequeathed in the Declaration of Rights, there is no escaping the fact that it

---

35. Steven G. Calabresi, *On Liberty, Equality, and the Constitution: A Review of Richard A. Epstein's The Classical Liberal Constitution,* 8 N.Y.U. J.L. & LIBERTY 839, 857 (2014).

36. LEONARD W. LEVY, ORIGINS OF THE BILL OF RIGHTS 184 (Yale Nota Bene 2001).

37. W.F. Dunaway, Jr., *The Virginia Conventions of the Revolution*, 10 VA. L. REG. 567, 584 (1904).

38. *See generally* Barron v. Baltimore, 32 U.S. 243 (1833) (holding that the Bill of Rights limited the powers of the federal government, not the individual states).

was a flawed document. For instance, the clause that protects against self-incrimination provides that "a man . . . shall not . . . be compelled in any criminal proceeding to give evidence against himself."[39] It thus appears to apply only to criminal defendants in a criminal trial, in contrast to the broader protections afforded by the privilege as it developed at common law. Professor Leonard Levy observed that the protections against self-incrimination found in the Virginia Declaration of Rights "provided only a stunted version of the common law" and were "the product of bad drafting."[40]

Additionally, the Declaration of Rights did not contain a due process clause until the 1902 revision of the Constitution, but even then it applied only to deprivations of property.[41] It was not until 1971 that its protections were extended to life and liberty.[42] Although not contained in the Declaration of Rights, the Constitution of Virginia did not even have a provision for future amendments until 1870, a century after the Constitution had been in effect.[43] Thomas Jefferson observed that the Constitution of Virginia "was formed when we were new and unexperienced in the science of government."[44]

Perhaps most glaring is the fact that the Declaration loudly proclaimed the equality of all men despite the prevalence and widespread acceptance of slavery. In fact, the Convention engaged in vigorous debate over Mason's language, which stated that "all Men are born equally free and independent [sic]."[45] Slaveholders argued, correctly as it turns out, that this kind of language would be pressed into service for those who wished to abolish slavery.[46]

---

39. VA. CONST. art. I, § 8.

40. LEVY, *supra* note 36, at 183. Despite the cramped text, Virginia courts have interpreted the clause consistently with the broader privilege afforded by the common law.

41. VA. CONST. of 1902, art. I, § 11 ("[N]o person shall be deprived of his property without due process of law.").

42. REPORT OF THE COMMISSION ON CONSTITUTIONAL REVISION, Va. H. Doc. No. 1, at 95–96 (1969).

43. STEPHEN R. MCCULLOUGH, VIRGINIA CONSTITUTIONAL LAW § 18.01 (2026).

44. THOMAS JEFFERSON, NOTES ON THE STATE OF VIRGINIA, *reprinted in* THOMAS JEFFERSON: WRITINGS 243 (Merrill D. Peterson ed., 1984).

45. TARTER, *supra* note 8, at 50.

46. For example, John Brown's 1859 anti-slavery manifesto, "A Declaration of Liberty by the Representatives of the Slave Population of the United States of America," employed such language. *See* John Brown, *A Declaration of Liberty by the Representatives of the Slave Population of the United States of America*,

Thomas Ludwell Lee, who served on the drafting committee alongside George Mason, lamented that

> a certain set of aristocrats, for we have such monsters here, [who upon] finding that their execrable system [of slavery] cannot be reared on such foundations, have to this time kept us at bay on the first line, which declares all men to be born equally free and independent. . . . The words as they stand are approved by a very great majority, yet by a thousand masterly fetches and stratagems the business has been so delayed that the first clause stands yet unassented to by the Convention.[47]

Some minor changes to the language placated the slaveholding interest. Specifically, the Convention changed the opening line from "all men are born equally free" to "all men are by nature equally free," and the word "natural" was also deleted.[48] Finally, the Convention agreed to a suggestion by Edward Pendleton that the words "when they enter into a state of Society" should be added as a further qualification.[49]

These debates and course corrections indicate that, although we celebrate our inheritance of freedom, we also must recognize that a constitution—and, indeed, securing liberty—is a work in progress, and that each succeeding generation must shoulder its responsibility to secure and perfect its inheritance.

Virginians have taken up this responsibility on a number of fronts, securing, among other improvements, the right to vote regardless of race or sex[50] and the right for children to receive an education through elementary and secondary school.[51] The struggles for these rights played out over decades. The fight to expand the voting franchise stretches all the way back to 1830, when an ill-fated constitutional convention sought to wrest more political power from the landed elite.[52] Likewise, the struggle to ensure the right to universal public education dates back to colonial times. In

---

reprinted in DIGITAL HISTORY, https://www.digitalhistory.uh.edu/active_learning/explorations/brown/planning3.cfm [https://perma.cc/D53F-DLJ6].

47. Letter from Thomas Ludwell Lee to Richard Henry Lee (June 1, 1776), *quoted in* Editorial Note to *Virginia Declaration of Rights*, *in* 1 THE PAPERS OF GEORGE MASON, 1725–1792, at 275 (Robert A. Rutland ed., 1970).

48. *Id.* at 289.

49. Brent Tarter, *The Virginia Declaration of Rights*, *in* TO SECURE THE BLESSINGS OF LIBERTY: RIGHTS IN AMERICAN HISTORY 37, 46 (Josephine F. Pacheco ed., 1993).

50. VA. CONST. art. II, § 1.

51. *Id.* art. VIII, § 3.

52. *See* TARTER, *supra* note 8, at 78–95, 105.

1779, Thomas Jefferson called for the establishment of universal public education in *A Bill for the More General Diffusion of Knowledge*.[53] In Jefferson's famous *Notes on the State of Virginia*, he suggested that "[a]n amendment of our constitution must here come in aid of the public education."[54] Later, in a biting missive, John Tyler, writing as Governor of Virginia in 1809, castigated the legislature for "its failure, by reason of a fatal apathy and a parsimonious policy, to provide state schools."[55] Finally, the right to a free public education became secure in 1869.[56]

B. *The Need to Strengthen Civics Education*

We are heirs to a tremendous legacy, one that protects our right to speak and worship as we please, that shields our person and our property from arbitrary intrusion, and that allows for change and accountability through the electoral process. As Justice Sandra Day O'Connor observed, however, "[t]he practice of democracy is not passed down through the gene pool. It must be taught and learned anew by each generation of citizens."[57]

A substantial body of literature has documented the decline of civics education and the limited grasp of basic principles of civics in the population at large.[58] One of the benefits of a republican form of government is its ability to reform and regenerate. If we are to secure "the blessings of liberty" for the next 250 years, we need a "frequent recurrence to fundamental principles," and that starts in

53. THOMAS JEFFERSON, *A Bill for the More General Diffusion of Knowledge*, *reprinted in* THOMAS JEFFERSON WRITINGS 365–73 (Merrill D. Peterson ed., 1984).

54. THOMAS JEFFERSON, *Notes on the State of Virginia*, *reprinted in* THOMAS JEFFERSON, WRITINGS 274 (Merrill D. Peterson ed., 1984).

55. John Tyler, *quoted in* WILLIAM ARTHUR MADDOX, THE FREE SCHOOL IDEA IN VIRGINIA BEFORE THE CIVIL WAR: A PHASE OF POLITICAL AND SOCIAL EVOLUTION 47 (1918).

56. VA. CONST. of 1869 art. VIII, § 3.

57. Sandra Day O'Connor, *quoted in* S. Res. 333, 118th Cong. 2–3 (2023) (as introduced).

58. For example, researchers at the Brookings Institution write that "civic learning is on the margins of young people's school experience." Rebecca Winthrop & Ariana Sharghi, *The Need for Civic Education in 21st-Century Schools*, BROOKINGS INST. (June 4, 2020), https://www.brookings.edu/articles/the-need-for-civic-education-in-21st-century-schools/ [https://perma.cc/9JP6-VMMZ]. The Sandra Day O'Connor Institute issued a report noting that "American schools once prioritized civics instruction and no longer do." *When and Why Did America Stop Teaching Civics?*, SANDRA DAY O'CONNOR INST. FOR AM. DEMOCRACY (Sept. 2024), https://oconnorinstitute.org/wp-content/uploads/When-and-Why-Did-America-Stop-Teaching-Civics_.pdf [https://perma.cc/39NU-QTD7].

the classroom.[59] Fortunately, a number of entities have taken up the challenge, including the national platform iCivics[60] and the civics education materials developed by the John Marshall Center.[61] Under the leadership of Chief Justice Powell, the Supreme Court of Virginia has launched Virginia Judicial Civics Week, which offers programming to students and teachers to expand their understanding of the role of the Virginia judiciary and its role in the constitutional design.

CONCLUSION

The Virginia Declaration of Rights warrants recognition alongside the Declaration of Independence as one of the pivotal documents in the history of our Nation. Much of the world's history chronicles the achievements of sanguinary leaders whose chief aim was expanding their own power and wealth. The founding of a republic devoted to the flourishing of a sovereign people through a regime of ordered liberty is an event worth celebrating. The adoption of the Virginia Declaration of Rights 250 years ago propelled the Nation in the right direction. The burden now rests with us to perpetuate this legacy of freedom.

59. VA. CONST. art. I, § 15.

60. ICIVICS EDUCATION, https://ed.icivics.org/ [https://perma.cc/QQ4F-HXD7].

61. *John Marshall Center at the VMHC*, *Civics Education*, VIRGINIA MUSEUM OF HISTORY AND CULTURE, https://virginiahistory.org/learn/civics-education/john-marshall-center-vmhc [https://perma.cc/JZ9W-HWKD].

***