

**PICTURE-FULFILLMENT NEW COVENANT THEOLOGY:
A POSITIVE THEOLOGICAL DEVELOPMENT?**

Zachary S. Maxcey

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Introduction

Within the theological system known as New Covenant Theology (NCT), a recent development has occurred, namely, the emergence of a new understanding: Picture-Fulfillment New Covenant Theology. This particular NCT strain is vigorously promoted by the Earth Stove Society² and the Christ My Covenant³ website, and it is becoming increasingly widespread in the NCT community. Like other forms of NCT, it strongly emphasizes Christocentric hermeneutics, a redemptive historical approach to Scripture, and New Testament (NT) interpretation of the Old Testament (OT). However, its more distinctive doctrinal features have become a cause for concern among proponents of Classic NCT.⁴ Three distinctives of Picture-Fulfillment NCT will be analyzed in this paper: Christ is the New Covenant, the Spirit is the law written on a believer's heart, and the Law of Christ is also Christ Himself rather than a system of New Covenant (NC) law. The purpose of this paper is to *fairly*⁵ and *biblically* critique the above distinctives in order to ascertain whether or not the 'Picture-Fulfillment' view is a positive development in our understanding of NCT.

Is Christ the New Covenant?

One of the key distinctives of Picture-Fulfillment NCT is the claim that the Lord Jesus Christ incarnates or 'enfleshes' the New Covenant. For example, Chad Bresson writes, "God's promise of the New Covenant was that the Messiah would be Himself the embodiment of an everlasting covenant with His people. This promise, typified in the covenants, is fulfilled in Christ. (Is. 42:6-9; 43:19; 45:21-25; 46:9-13)."⁶ Elsewhere, he states, "As the fulfillment of the Old Testament promises of a New Covenant, Jesus Christ personifies, embodies, and incarnates the New Covenant. Thus, he Himself is the New Covenant (Isaiah 42:6, 49:8, Luke 22:20)."⁷ Additionally, Bresson asserts, "The

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²For information, see <http://earthstovesociety.com/>.

³For information, see <http://christmycovenant.com/>.

⁴This author defines Classic New Covenant Theology as that branch of NCT taught and promoted by John Reisinger, Gary D. Long, Tom Wells, A. Blake White, and the faculty of Providence Theological Seminary.

⁵This paper is intended to be an honest and fair critique of Picture-Fulfillment NCT, not a personal attack upon its advocates.

⁶Chad R. Bresson, "What is New Covenant Theology?" (a list of NCT tenets prepared originally for the Christ My Covenant website but later posted to the Earth Stove Society website) accessed 03 September 2011; available from <http://earthstovesociety.com/?p=197>; Internet, Tenet 17.

⁷Chad R. Bresson, "The Exceeding Righteousness of the New Covenant" (a message prepared for the Christ My Covenant website in June 2009) accessed 7 October 2011; available from <http://christourcovenant.blogspot.com/2009/06/exceeding-righteousness-of-new-covenant.html>; Internet, Paragraph 1 of "The New Covenant" subsection.

New Covenant is not like the covenant made with the people through Moses. Embodied and personified in Christ, the New Covenant brought into existence through the life and cross work of Christ is made with his redeemed people through grace. God's people do not enter the New Covenant by works, but by grace through faith; it is radically internal, not external; everlasting, not temporary."⁸

Advocates of Picture-Fulfillment NCT are emphatic in stressing that it is essential for the New Covenant believer to understand the 'Christ is the Covenant' principle if they are to experience a dynamic Spirit-filled life. Regarding the 'necessity' of this doctrine, Bresson states:

Because **Christ has become a Covenant for His people** and the **Spirit** has descended to indwell Christ's people as **the law written on the heart**, there is an altogether new dynamic inherent to the question of New Covenant ethics. No longer do imperatives find their impetus from without as was true of the Mosaic Code (exemplified in the Tablets of Stone), but from within. **The nature of the command itself is no longer external, but internal.** Obedience isn't acquiescence to an external demand, but the manifestation of an inward reality.⁹

In another place, he notes, "Christ is the Law of the New Covenant, incarnating the new standard of judgment as to what 'has had its day' in the law and what has abiding validity (Col. 2:17). The Holy Spirit is the indwelling Law of Christ, causing New Covenant members to obey Christ the Law in conformity to His image."¹⁰ However, one must ask not only if the Bible truly teaches that Christ incarnates the New Covenant, but also if such an understanding is truly necessary for the Spirit-filled life of the New Covenant.

The Hebrew of Isaiah 42:6 and 49:8

Contrary to the teaching of Picture-Fulfillment NCT, Isaiah 42:6 and 49:8 do not support the assertion that Christ incarnates the New Covenant, and this can be demonstrated both grammatically and contextually.¹¹ The phrase in question is the same in both verses: *liběřîť 'ām* (לְבִרְיִת עָם). Isaiah 42:6 declares, "I am the LORD; I have called you in righteousness; I will take you by the hand and keep you; I will give you as a covenant for the people (*liběřîť 'ām*), as a light for the nations."¹² Isaiah 49:8 similarly states, "Thus says the LORD: 'In a time of favor I have answered you; in a day of salvation I have helped you; I will keep you and give you as a covenant to the people (*liběřîť 'ām*), to

⁸Bresson, "What is New Covenant Theology?," Tenet 22.

⁹Chad R. Bresson, "The Incarnation of the Abstract: New Covenant Theology and the Enfleshment of the Law" (a message prepared for 2011 New Covenant Theology Think Tank, Rushville, NY) accessed 7 October 2011; available from <http://www.earthstovesociety.com/essmedia2011/bresson%20-%20The%20Incarnation%20of%20the%20Abstract%20-%20NCT%20Think%20Tank%202011.pdf>; Internet, 2-3.

¹⁰Bresson, "What is New Covenant Theology?," Tenet 43.

¹¹Advocates of Picture-Fulfillment NCT also cite Luke 22:20 as a proof text for their assertion that Christ is the incarnation of the New Covenant. Luke 22:20 declares: "And in the same way *He took* the cup after they had eaten, saying, 'This cup which is poured out for you is the new covenant in My blood.'" The natural reading of this verse indicates that the cup of the Lord's Table is the New Covenant, that is, the sign of the New Covenant. Luke appears to use a synecdoche in this verse to indicate that the cup of the Lord's Table is the covenantal sign of the New Covenant, just as the Sabbath was the sign of the Old Covenant. Also, the phrase "in my blood" indicates not the nature of the New Covenant but its purchase/inauguration price. See David W. Pao and Eckhard J. Schnabel, "Luke," in *Commentary on the New Testament Use of the Old Testament*, ed. Gregory K. Beale and Donald A. Carson (Grand Rapids, MI: Baker Academic, 2007), 382. Here, these authors write: "...Luke (and Paul) relates *touto* [i.e. this] to the cup that is, together with its contents, the symbol of the new covenant, which the blood of Jesus inaugurated." As a result, proponents of Picture-Fulfillment NCT cannot justifiably use Luke 22:20 to undergird their assertion that Christ Himself is the New Covenant without distorting its remarkably clear meaning.

¹²All of this author's Bible citations are from the ESV unless otherwise stated.

establish the land, to apportion the desolate heritages.” Grammatically speaking, the Hebrew text is quite clear that the prefixed preposition *le* (ל) in both instances of *libērîṭ ‘ām* is functioning in a comparative manner.¹³ For example, a similar construction is used in Isaiah 42:6 immediately following *libērîṭ ‘ām*: “as a light to the nations” (*le’ôr gôîm* – לְאוֹר גּוֹיִם). Contextually speaking, it is also quite clear that *libērîṭ ‘ām* and *le’ôr gôîm* in Isaiah 42:6 are parallel phrases. Regarding this point, Edward J. Young states, “Parallel to the expression *covenant of the people* is the phrase *light of the Gentiles*. Not merely does the servant bring light or lead into light, but he is himself the light. Light is a figurative designation of salvation (49:6).”¹⁴ In other words, *libērîṭ ‘ām* and *le’ôr gôîm* both function as figurative references to Christ’s redemptive work.

Now, unless advocates of Picture-Fulfillment NCT, for the sake of grammatical and literary consistency, are willing to say that *le’ôr gôîm* teaches that the Lord Jesus Christ is composed of literal photons of light, it seems obvious that *libērîṭ ‘ām*, like *le’ôr gôîm*, is functioning as a simile. The phrase *le’ôr gôîm* teaches that Christ will metaphorically function *as* a light to the nations in that He will not only expose their darkness (i.e. their sin) but also cast it out.¹⁵ Similarly, with regard to *libērîṭ ‘ām*, Isaiah 42:6 and 49:8 both indicate that in fulfillment of the Abrahamic Covenant¹⁶ the Lord Jesus will function *like* a covenant, binding His chosen people to God. Moreover, Christ is the Lord and mediator (cf. Heb 8:6) of the New Covenant, not the covenant itself. Young aptly notes:

That the servant is identified with the covenant of course involves the idea of his being the one through whom the covenant is mediated... **To say that the servant is the covenant is to say that all the blessings of the covenant are embodied in, have their root and origin in, and are dispersed by Him.** At the same time He is himself at the center of all blessings, and to receive them is to receive Him, for without Him there can be no blessings.¹⁷ **[emphasis mine]**

It is readily conceded that the statement, “Christ is the New Covenant” is biblical, *provided that it is understood metaphorically, not ontologically.*¹⁸ **However, this is precisely the issue with Picture-**

¹³Ronald J. Williams, *Williams’ Hebrew Syntax* (Toronto: University of Toronto Press, 1967; reprint 1976, 2007, 2008, 2010), 109. See also Bruce K. Waltke and M. O’Conner, *An Introduction to Biblical Hebrew Syntax* (Winona Lake, IN: Eisenbrauns, 1990), 206.

¹⁴Edward J. Young, *The Book of Isaiah*, vol. 3 (Grand Rapids, MI: Eerdmans, 1972), 121.

¹⁵Consider other metaphorical uses of ‘light’ in the Scriptures. For example, Jesus calls both Himself and His followers the “light of the world” (John 8:12; Matt 5:14-16). Furthermore, the Apostle Paul takes Isaiah 49:6, another instance where the phrase *le’ôr gôîm* occurs, and applies it to himself and Barnabas. Obviously, these passages are using ‘light’ metaphorically, not ontologically.

¹⁶The contexts of Isaiah 42:6 and 49:8 indicate that the Messiah’s fulfillment of the Abrahamic Covenant is primarily in view. However, seeing as how the Abrahamic Covenant is ultimately fulfilled in the New Covenant (NC), the NC is likely in view as well.

¹⁷Young, *Isaiah*, 120-21. See also C.F. Keil and F. Delitzsch, *Commentary on the Old Testament*, Volume VII: Isaiah (Grand Rapids: Eerdmans Publishing Company, 1973), 179-80. Keil and Delitzsch understand Isaiah 42:6 metaphorically to indicate the Messiah’s role as the “mediator” and “medium” of the covenant.

¹⁸Although some Classic NCT theologians state that Christ is the New Covenant, they, unlike advocates of Picture-Fulfillment NCT, invest this statement with a metaphorical meaning. As a result, it is inappropriate for proponents of Picture-Fulfillment NCT to appeal to such Classic NCT sources for support. Consider the following statements by certain advocates of Classic NCT. See Fred G. Zaspel, *The New Covenant and New Covenant Theology* (Frederick, MD: New Covenant Media, 2011), 3. Zaspel writes: “It [the New Covenant] is held out as Israel’s hope in an array of Old Testament passages – once under the name ‘new covenant’ (Jer. 31:34), seven times as an ‘everlasting covenant’ (Jer. 32-33 [cf. 32:40]; 50:5; Ezek. 16:60; 37:26; Isa. 24:5; 55:3; 61:8; cf. Hos. 2:14-23), three times as the ‘covenant of peace’ (Isa. 54:10; Ezek. 34:25; 37:26), sometimes with the no specific ‘covenant’ name attached at all (Ezek. 36:22ff), and once the Servant of the Lord is said himself to be the covenant (Isa. 49:8).” See also John Reisinger, “The Marks of a New Covenant Ministry: A Study in 2 Corinthians 3 – Part 4,” *Sound of Grace* 166 (April 2010): 4. Concerning the phrase ‘the

Fulfillment NCT teaching: its advocates understand Christ to be the New Covenant ontologically, not metaphorically. Consider a metaphorical understanding of Isaiah 42:6 and 49:8 in light of other *metaphorical* messianic titles of the Lord Jesus Christ in both the OT and NT: the Branch (Isa 4:2; Jer 23:5, 33:15; Zech 3:8, 6:12; the root of Jesse (Isa 11:1, 10); the Lamb of God (John 1:29, 36; Rev. 5-7, 12-15, 17, 19, 21-22), a horn of salvation (Luke 1:69), the Bread of Life (John 6:33-35, 48, 51), the True Vine (John 15:1, 4-5), a Light to the Gentiles (Luke 2:32), the Light of the World (John 8:12, 9:5), the Lion of Judah (Rev 5:5), and the Root of David (Rev 5:5). Some may argue that this is wholly an issue of semantics, but as this paper continues to unfold, the reader will soon discover this is not the case.

Is the Holy Spirit the Law of Christ?

A second distinctive of Picture-Fulfillment NCT is the claim that the Spirit *is* the “law” written on a believer’s heart. Bresson writes, “The Holy Spirit is the indwelling Law of Christ, causing New Covenant members to obey Christ the Law in conformity to His image.”¹⁹ Elsewhere, he states, “For the New Covenant church, the law of God is no longer an external standard that demands compliance with the will of God. The Law of Christ as the indwelling Spirit is now an internal person who causes and inclines us to obey God from the heart.”²⁰ In “Incarnation of the Abstract,” Bresson again notes:

Because **Christ has become a Covenant for His people** and the **Spirit** has descended to indwell Christ's people as **the law written on the heart**, there is an altogether new dynamic inherent to the question of New Covenant ethics. No longer do imperatives find their impetus from without as was true of the Mosaic Code (exemplified in the Tablets of Stone), but from within. **The nature of the command itself is no longer external, but internal.** Obedience isn't acquiescence to an external demand, but the manifestation of an inward reality.²¹

Advocates of Picture-Fulfillment NCT base their assertion that the Spirit is the law written upon a believer’s heart not only upon their *systematization*²² of Jeremiah 31:31-34 and Ezekiel 36:24-28 but also their interpretation of 2 Corinthians 2:14-4:6. Bresson writes: “A proper biblical theology of the Isaiah, Jeremiah, and Ezekiel New Covenant passages shows the ‘law written on the heart’ is one and

Lord is the Spirit’ in 2 Cor. 3:17, Reisinger states: “But what does Paul mean by writing that the Lord is the spirit? I suggest that we read Paul here this way: Christ not only is the mediator and the surety (guarantee) of a better covenant (Heb. 7:22), *he is the covenant* (Isa. 42:6). The Greek word for spirit used here is *pneuma*, which translates variously as breath, vital spirit/life, or rational spirit/mind. Jesus Christ is the *sine qua non* of the New Covenant; that without which there would be no New Covenant. He is as essential to the New Covenant as breath is to life. He is the ruling principle and the essence of the New Covenant—he is the covenant itself. Christ is the sacrificial lamb; he is the Great High Priest; he is the altar; he is the surety and mediator of the new and better covenant; and he is actually the covenant itself.” Surely Reisinger understands this statement metaphorically, not ontologically.

¹⁹Bresson, “What is New Covenant Theology?,” Tenet 43. See also Tenet 47 of the same message. See also the comments of Steve Fuchs in the Christ Our Covenant blog entitled “The Various Branches of New Covenant Theology” (available at <http://christourcovenant.blogspot.com/2009/02/all-proponents-of-nct-believe-christ.html>). In the introductory description of Picture-Fulfillment NCT, Fuchs writes, “Christ’s Spirit indwelling God’s people is what is written on their hearts. He isn’t there to etch any words on the heart or mind, HE himself IS what’s etched - He is both the **standard of righteousness** and the **cause of righteousness** within them. He is the perfect anti-type of codified law. . . . **The Law of Christ is the Spirit of Christ written on your heart. He is both the Standard of God’s righteousness and the Cause of righteousness in your nature.**”

²⁰Ibid., Tenet 49.

²¹Bresson, “The Incarnation of the Abstract,” 2-3.

²²Although prominent promoters of Picture-Fulfillment NCT may insist otherwise, their interpretation of Jeremiah 31:31-34 with Ezekiel 36:24-28 reflects a systematic, not biblical, approach to these two texts.

the same as ‘the Spirit placed within’. This is Paul’s interpretation of the Old Testament’s New Covenant passages in 2 Corinthians 3.”

Does 2 Corinthians 3:6 Identify the Spirit as a New Law?

Contrary to the teaching of Picture-Fulfillment NCT, 2 Corinthians 3:6 does not allow for the assertion that the Spirit is the law written upon a believer’s heart. 2 Corinthians 3:5-6 declares, “Not that we are sufficient in ourselves to claim anything as coming from us, but our sufficiency is from God, who has made us competent to be ministers of a new covenant, not of the letter but of the Spirit. For the letter kills, but the Spirit gives life.” With the final statement of 2 Corinthians 3:6, “For the letter kills, but the Spirit gives life,” the apostle is *not* contrasting “the letter” (i.e. the Mosaic Law) and “the Spirit” as two types of ‘law’. In other words, Paul is not pitting “the letter” as a ‘law’ containing objective written/external commandments against “the Spirit,” a new ‘law’ containing no objective written/external commandments. Rather, he is contrasting two distinct eras of redemptive history, the Old Covenant age (characterized by the Mosaic Law) and the New Covenant age (characterized by the Spirit). Regarding “the Spirit-letter contrast” in 2 Corinthians 3:6, Thomas Schreiner states that “the Spirit’s work represents the coming of the new era in Christ.”²³

In defense of his apostolic ministry, Paul contrasts the two redemptive-historical eras via their respective covenants throughout 2 Corinthians 2:14-4:6 in order to demonstrate the New Covenant’s superiority over the Old Covenant. The Old Covenant was a “ministry of death” (2 Cor 3:7) and “condemnation” (2 Cor 3:9), and its defining dynamic was the Law of Moses, which, although a blessing for the regenerate²⁴ Israelite (e.g. Pss 19:7; 40:8; 119:72, 97, 174), inexorably resulted in death for the unregenerate²⁵ Israelite (2 Cor 3:6). However, the Mosaic Law resulted in death for unregenerate Israelites *not because* it contained objective written/external commandments (as Picture-Fulfillment NCT advocates assert) *but because* the Old Covenant community, apart from the internal (i.e. regenerative) working of the Holy Spirit, was utterly incapable of keeping the Law.²⁶ This

²³Thomas R. Schreiner, *40 Questions about Christians and Biblical Law* (Grand Rapids, MI: Kregel Publications, 2010), 144. See also A. Blake White, *The Newness of the New Covenant* (Frederick: New Covenant Media, 2008), 36. Regarding 2 Corinthians 3:6, White states, “Second Corinthians 3:4-4:18 is an important text on the relation of the old and new covenants in Paul. He expounds the superiority of the ministry of the new covenant over the old. He writes that God ‘made us competent to be ministers of a new covenant, not of the letter but of the Spirit. For the letter (*gramma*) kills, but the Spirit (*pneuma*) give life (3:6, cf. Rom 2:29, 7:6). The context makes clear that Paul uses ‘letter’ to refer to the Mosaic Law (3:3), which has an inseparable connection to the Mosaic Covenant in 2 Corinthians 3. **The *gramma/pneuma* contrast should be understood in terms of salvation history**” [emphasis mine].

²⁴The regeneration of the OT remnant of Israel by the Holy Spirit is the fulfillment of the spiritual promises of the Abrahamic Covenant, not the Old Covenant.

²⁵The OC community of Israel was largely unregenerate. For example, Jeremiah 9:26b proclaims that “all the house of Israel is uncircumcised in heart” (cf. Isa. 1:9; Heb 3:16-4:6). See also John G. Reisinger, *Abraham’s Four Seeds* (Frederick, MD: New Covenant Media, 1998), 77. Reisinger states that Israel was “indeed a *special* nation....but the nation by and large was unregenerate.” See also John G. Reisinger, *Tablets of Stone & the History of Redemption* (Frederick, MD: New Covenant Media, 2004), 44. On page 44, Reisinger writes, “It is true that God showed special favor to the Jews in their redemption from Egypt, but that was a *physical* redemption. Most of those Israelites were still hard-hearted sinners who needed to be convinced of their lost estate (Hebr. 3:16-19).”

²⁶Picture-Fulfillment NCT proponents insist that the Old Covenant’s codified system of written/external commandments (i.e. the Mosaic Law) is precisely what made that covenant a “ministry of death” (2 Cor 3:7) and “condemnation” (2 Cor 3:9). However, such a conclusion misses the mark. The Apostle Paul declares the Law and its commandments to be “holy and righteous and good” (Rom 7:12), “spiritual” (Rom 7:14), and “not contrary to the promises of God” (Gal 3:21). Again, the Mosaic Code resulted in death, cursing, and condemnation for unregenerate Israel, **not because** it contained written/external commandments, **but because** the OC community, apart from the internal (i.e. regenerative) working of the Holy Spirit, was utterly incapable of keeping the Law. In other words, the problem with the

internal working of the Spirit was only experienced by a small remnant of the OC community to whom God freely and sovereignly chose to extend it in order to fulfill the spiritual promises made to Abraham. In contrast to the Old Covenant, the New Covenant is a “ministry of the Spirit” (2 Cor 3:8) and “righteousness” (2 Cor 3:9), and its defining dynamic is the Spirit, who inexorably produces “life” (2 Cor 3:6) in all members of the New Covenant. Paul Williamson argues that the “most radical distinctive of the new covenant” is that it “would affect the *entire* covenant community” unlike its predecessor:

Internalization of the law was not a radically new concept (Deut. 11:18; cf. 30:14), nor was the associated idea of circumcision of the heart (Deut. 10; cf. 30:6). But such had certainly not been the collective experience of the covenant community [under the OC]. Rather, such had been the distinguishing mark of individuals in the community who constituted Israel’s righteous remnant. The majority – as Jeremiah himself had underlined (cf. Jer. 17:1) – had hearts engraved with sin and were thus spiritually uncircumcised (cf. Jer. 9:26; 16:10-13). However, the law would be internalized by everyone who belonged to the covenant community of the future...[T]he entire community will reflect such knowledge of Yahweh...That such knowledge issuing in obedience will be reflected in the entire covenant community (‘they will all know me, from the least of them to the greatest’ TNIV) is clearly one of the most distinctive features of the new covenant.²⁷

Elsewhere, he writes, “Paul’s argument, therefore, is not that the letter associated with the old covenant is bad or inherently flawed. Rather, it is that it is vastly inferior to the life-giving Spirit associated with the new covenant.”²⁸ To insist that Paul’s redemptive-historical contrast teaches that the Spirit is a new ‘law’ and that all written/external commandments produce death is to stretch the text of 2 Corinthians 3 far beyond the apostle’s intent. It neither logically nor exegetically follows that Paul aims to teach either of these assertions.

Is the Spirit the “Law” Written Upon the Heart?

Although both Jeremiah 31:31-34 and Ezekiel 36:24-28 are important texts which detail the promises and stipulations of the New Covenant, to *equate* “my Spirit” of Ezekiel 36:27 with “my law” of Jeremiah 31:33 results in both an exegetical and logical fallacy. It neither logically nor exegetically follows here that these two particular NC promises (i.e. Ezek 36:27; Jer 31:33) should be equated with one another.²⁹ By equating these two passages, advocates of Picture-Fulfillment NCT have unnecessarily blurred or obscured the important distinctions in these texts. The most natural way to reconcile Ezekiel 36:27 with Jeremiah 31:33 is to recognize that these two passages address two distinct ministries of the Holy Spirit. Whereas Jeremiah 31:33 speaks of regeneration by the Holy Spirit in terms of the internalization of God’s law (“I will put my law within them, and I will write it on their hearts”),³⁰ Ezekiel 36:27 speaks first of the Holy Spirit indwelling believers forming the body

Old Covenant was neither the covenant itself nor its commandments; rather, the problem was the fallen, unregenerate state of the covenant community. See A. Blake White, *The Newness of the New Covenant* (Frederick: New Covenant Media, 2008), 17. White rightly declares, “Indeed, Israel was unable to serve the Lord (Josh 24:19), lacking the heart inclined to keep the Torah (Deut 30:6, 31:16).”

²⁷Paul R. Williamson, *Sealed with an Oath: Covenant in God’s Unfolding Purpose* (Downers Grove, IL: Intervarsity Press, 2007), 154-56.

²⁸Ibid., 193.

²⁹Although the similar phraseology in “I will put my Spirit within you” (Ezek 36:27) and “I will put my law within them” (Jer 31:33) indicates that these two passages are *related*, such similarity does *not* demand that they be directly equated with one another.

³⁰See Peter O’Brien, *The Letter to the Hebrews, Pillar New Testament Commentary*, ed. Donald A. Carson (Grand Rapids, MI: Eerdmans, 2010), 298-9. Beginning on page 298, O’Brien writes: “...in the new covenant there is a

of Christ at Pentecost³¹ (“I will put my Spirit within you”) and second of regeneration in terms identical to Jeremiah 31:33 (“I will...cause you to walk in my statutes and be careful to obey my rules”). Ezekiel 36:27 declares that the Spirit of God would not only indwell NC believers but also “cause” them to obey God’s commandments (cf. Phil 2:13; Rom 8:13-14; 1 Pet 1:2). What are these commandments, if not the Law of Christ in the New Covenant? The Scriptures also declare that the Holy Spirit teaches believers “all things” (John 14:26a), brings to believers’ remembrance Christ’s teaching (John 14:26b), testifies of Christ (John 15:26), and guides believers “in all the truth” (John 16:13). These things, this teaching, this testimony, and this truth all center upon the Lord Jesus Christ, His Word, and His Law (i.e. the Law of Christ). The Spirit is not the law written upon a believer’s heart, but as part of His New Covenant ministry, He Himself performs divine ‘heart-replacement surgery’, whereby a NC believer is the recipient of a new heart which *causes* him to *willingly* obey God and keep His *inscripturated* commandments (i.e. the Law of Christ).

Is Christ Himself the Incarnate Law of Christ?

A third distinctive of Picture-Fulfillment NCT is the claim that the Law of Christ is ontologically Christ Himself rather than a written system of New Covenant (NC) law. In support of this view, Bresson claims, “Christ is the Law of the New Covenant, incarnating the new standard of judgment as to what ‘has had its day’ in the law and what has abiding validity (Col. 2:17).”³² Elsewhere, he writes, “That the Law is a Person [i.e. Christ] means the Law of the New Covenant is not encoded in external imperatives or principles.”³³ Advocates of Picture-Fulfillment NCT base their assertion that Christ Himself is the Incarnate Law of Christ on a three-fold foundation. First, they rightly recognize that there is an intimate connection between law and covenant, especially with regard to the Old Covenant. For example, Bresson writes, “As to the connection between law and covenant...there is much correlation between ‘covenant’ and ‘law’... esp. in the Mosaic economy...so much so, that there are times, esp. in Hebrews, where the terminology is virtually interchangeable.”³⁴ As a result, they argue that if Christ is the Incarnated New Covenant, He must also be the Incarnated Law of Christ. Second, they insist that if the Spirit is the law written upon a believer’s heart, Christ Himself must also be the Law of Christ. Steve Fuchs blogs:

I would add that when we understand Christ to be the Law, we are really saying the Spirit of Christ...aka the Holy Spirit, while attempting to not short-change the 'oneness' between those two persons of the Trinity. Christ becomes Law, a Law which causes righteousness to be manifest in His

fundamental difference from the old: the *Lord himself* would write his law on the hearts of his people. **The internalization of the law, that is, obedience from the heart, which was expected under the old covenant, will now be accomplished by God. Further, this writing is not in the hearts of ‘scattered individuals’ but of the people as a whole; it is not simply internal but also universal. The prophet’s words imply the people’s receiving of a new heart, and this expressly promised in the parallel prophecy of Ezekiel: ‘I will give them an undivided heart and put a new spirit in them; I will remove from them their heart of stone and give them a heart of flesh. Then they will follow my decrees and be careful to keep my laws’ (Ezekiel 11:19-20; also 36:26-27)” [emphasis mine].**

³¹The body of Christ, which is the Church (Eph 1:22-23; Col 1:18, 24) was first formed as a redemptive-historical entity when the Holy Spirit was poured out upon believers at Pentecost in Acts 2 with its apostolic extensions in Acts 8, 10, 19. Recall Jesus’ promise to His disciples of the future indwelling of the Holy Spirit in John 14:17: “even the Spirit of truth, whom the world cannot receive, because it neither sees him nor knows him. You know him, for he dwells with you and will be in you.”

³²Bresson, “What is New Covenant Theology?,” Tenet 43.

³³Bresson, “The Incarnation of the Abstract,” 20.

³⁴Steve Fuchs, “The Various Branches of New Covenant Theology” (a ‘Christ Our Covenant’ blog) accessed 7 October 2011; available from <http://christourcovenant.blogspot.com/2009/02/all-proponents-of-nct-believe-christ.html>; Internet, Bresson’s comments added on March 7, 2009 at 2:44 PM.

people, by indwelling them as Holy Spirit. He and the Spirit are one, and in the same way we are made one in nature with them by their indwelling us.³⁵

Thirdly, advocates of Picture-Fulfillment NCT believe that the Mosaic Law (as a *system* of law) typified the Lord Jesus Christ, who Himself is the Incarnated Law of Christ (i.e. the NC ‘system’ of law). Bresson writes, “Christ didn't simply replace the law, but, having a typological relationship to the Mosaic law [i.e. not only in its component elements *but also as an entire system of law*], filled up the meaning and intent of that law in His obedience to the law and His death.”³⁶ As a result, “Christ embodies the Law and becomes the standard by which all holiness is measured. In becoming the sum and substance of law by filling up the law to its fullest measure, in fulfilling all that had been foreshadowed in the law, this king sitting on the mount is the full and final Torah, he is The Law of the New Covenant invested with all of its authority and glory.”³⁷

Does the Law–Covenant Connection Truly Verify Christ to be the Incarnated Law?

As stated above, advocates of Picture-Fulfillment NCT, using the law–covenant connection, unnecessarily force an ontological relationship between Christ and the Law of Christ. In doing so, however, these individuals are incorrectly applying one of John Reisinger’s own teachings to support their own theological conclusions. In *Tablets of Stone*, John Reisinger astutely teaches that the Ten Commandments are the summary statement not only of the entire Mosaic Law but also of the Old Covenant itself.³⁸ Thus, the Ten Commandments can be equated with the Old Covenant (cf. Ex 34:28; Deut 4:13, 10:4). As a result, since Picture-Fulfillment NCT’s proponents interpret the Lord Jesus Christ to literally be the New Covenant (using such passages as Isaiah 42:6 and 49:8), they proceed to literally equate Him also with the law of the New Covenant (i.e. the Law of Christ). On the surface, this appears to be impeccable logic, except for one glaring detail: Isaiah 42:6 and 49:8 (as demonstrated above) *cannot* be legitimately interpreted to ontologically equate the Lord Jesus with the New Covenant. This fact invalidates this whole line of argumentation. Although the Lord Jesus is the Great Exemplar of the standards found in the Law of Christ, He cannot be literally equated with the Law of Christ.³⁹ Moreover, Christ is the New Moses, the Lawgiver of the New Covenant as Isaiah 42:4 indicates: “...the coastlands wait for his law.”

³⁵Ibid., Fuchs’ comments added on March 7, 2009 at 4:17 PM.

³⁶Bresson, “The Incarnation of the Abstract,” 3.

³⁷Bresson, “The Exceeding Righteousness of the New Covenant,” Paragraph 6 of “An Exceeding Righteousness” subsection.

³⁸John G. Reisinger, *Tablets of Stone & the History of Redemption* (Frederick, MD: New Covenant Media, 2004), 3-4, 13-14.

³⁹This author believes that the most accurate definition (to date) of the Law of Christ appears in A. Blake White’s *The Law of Christ: A Theological Proposal* (Frederick, MD: New Covenant Media, 2010), 154. Here, White defines the Law of Christ in the following manner: “It is the law of love, the example of our Lord Jesus Christ, the teaching of Jesus, the teaching of the New Testament, and finally the whole canon interpreted in light of the Christ event.” Advocates of Picture-Fulfillment NCT have attempted to argue that White’s definition of the Law of Christ is not accurate, since it “conflicts” with a statement made by John Reisinger in the book’s forward (see the Earth Stove Society video review of White’s book at <http://earthstovesociety.com/?p=172>). Beginning on page 3 of White’s trailblazing work, Reisinger writes: “The law of Christ cannot be reduced to a list of do’s and don’ts. It certainly involves specific things than can be ‘listed’ as right or wrong, but it is far more than a list like the ten words written on stone. The law of Christ is love, but it is also the example of Christ. Everything Christ taught is part of His law, but so is everything His apostles taught a vital part of his law. Christ himself is his law personified. The whole of Scripture, as interpreted through the lens of Christ as the new covenant prophet, priest, and king, is a part of the law of Christ. These things are exegetically established in chapters 4-11 [of White’s book, *The Law of Christ*].” Although Reisinger states that “Christ himself is his law personified,” he

Does the Law of Moses Typify Christ?

As previously stated, proponents of Picture-Fulfillment NCT believe that the Mosaic Law (as a *system* of law, not just its component elements) typified the Lord Jesus Christ, who Himself is the Incarnated Law of Christ.⁴⁰ As to which NT passages support this assertion, Bresson points to Hebrews 10:1 and John 1:1, 14, 16-18. Hebrews 10:1 declares, “For the Law, since it has *only* a shadow of the good things to come *and* not the very form of things, can never by the same sacrifices year by year, which they offer continually, make perfect those who draw near.” The author of Hebrews is emphasizing the powerlessness of the Law (i.e. the Old Covenant) and the inefficacy of the OC sacrifices to make anyone perfect and righteous before God. He is not indicating that Christ Himself is the direct NC equivalent of the Law of Moses or even the Old Covenant. If any typological relationship exists in Hebrew 10:1, it is only that the imperfect OC sacrifices typified the perfect sacrifice of Christ. *To insist that the author of Hebrews is arguing that Christ is the NC equivalent of the OC Law of Moses is to make a false inference by eisogetting Picture-Fulfillment NCT presuppositions into the text.*

Regarding John 1:1, 14, 16-18, we must ask ourselves, “What is John’s purpose in calling the Lord Jesus Christ the Word of God?” First, John identifies Christ as the Word (i.e. Logos) to prove His preexistence, His divinity, and His divine creative power. Andreas K. Köstenberger writes:

The term ‘the Word’ conveys the notion of divine self-expression or speech (cf. Ps. 19:1-4). The Genesis creation provides ample testimony to the effectiveness of God’s word: he speaks, and things come into being (Gen. 1:3, 9; cf. 1:11, 15, 24, 29-30). Both psalmists and prophets portray God’s word in close-to-personified terms (Ps. 33:6; 107:20; 147:15, 18; Isa. 55:10-11), but only John claims that his word has appeared in space-time history as an actual person, Jesus Christ (1:14, 17).⁴¹

clearly does not invest his statement with an ontological sense. Rather, in light of the content of White’s book and in light of the fact that he agrees with White’s definition of the Law of Christ (as the context of his statement indicates), he intends his statement to be understood metaphorically. In other words, “Christ himself is his law personified,” in that He is the Great Exemplar of the inscripturated standards of the Law of Christ.

⁴⁰See Bresson, “The Incarnation of the Abstract,” 11. Bresson quotes Gregory K. Beale in the following manner, “Typology therefore indicates fulfillment of the indirect prophetic adumbration of events, people and institutions from the Old Testament in Christ who now is the final, climactic expression of all God ideally intended through these things in the Old Testament (e.g. *the Law*, the temple cultus, the commissions of the prophets, judges, priests, and kings; emphasis mine). Everything which these things lacked by way of imperfections was prophetically ‘filled up’ by Christ, so that even what was imperfect in the Old Testament pointed beyond itself to Jesus.” In other words, Bresson understands Beale to be in agreement with his view that the Mosaic Law (as a *system* of law, not just its component elements) typified the Lord Jesus Christ, who Himself is the Incarnated Law of Christ. *However, this is a clear misreading of Beale.* By saying that “the Law” is typological of Christ, Beale is not stating or even implying that Christ is the Antitype of the Law of Moses in that He Himself is the incarnated Law of Christ. It seems more likely that Beale uses “the Law” to encompass all the other typological components of the Law of Moses which are not included in the categories of “the temple cultus, the commissions of the prophets, judges, priests, and kings.” These other typological components, summed up by the term “Law,” would include, among other things, Adam (as the federal head of the fallen human race), the Garden of Eden (against Christ as the Temple of God), the exodus (against Christ’s own exodus from Egypt as a little child), the wilderness wanderings (against Christ’s temptation in the wilderness), etc. Or, he uses it as a summary classification which itself contains the sub-categories of the temple cultus, etc. Or again, Beale uses it to say that the Law of Moses is typologically replaced by the Law of Christ (which is not to be understood as Christ Himself). This quotation of Beale does not support the Picture-Fulfillment NCT position.

⁴¹Andreas K. Köstenberger, “John,” in *Commentary on the New Testament Use of the Old Testament*, ed. Gregory K. Beale and Donald A. Carson (Grand Rapids, MI: Baker Academic, 2007), 421.

Second, the Apostle John is also connecting the Lord Jesus Christ with “the Word” (*mymr* – מִימַר) of the Jewish Targums, an Aramaic translation of the Hebrew Scriptures in use at the time of Christ and the Apostles.⁴² It is important to note that the translators of the Targums frequently substituted the Aramaic *mymr* (מִימַר) for or combined it with *'elohîm* (אֱלֹהִים) and *Yahweh* (יְהוָה).⁴³ For example, the Targum version of Genesis 15:6 reads, “And he believed in the Word, the Lord, and He reckoned (it) to him for innocence / righteousness.” Or consider the final clause of Isaiah 48:16, “and now the Lord God has sent Me and His Word;” “His Word” is substituted for “His Spirit” in the Hebrew Masoretic Text (MT).⁴⁴ Thus, John is equating the Lord Jesus with “the Word,” the divine personage in the Jewish Targums. Third, it is also likely that the Apostle is connecting Christ with personified Wisdom, whereby the Lord “founded the earth” (Prov 3:19, 8:22-31; cf. 1 Cor 1:24). In view of this evidence, it is illogical and exegetically dubious to argue that because Christ is *the Word* of God and the Law of Moses is *a word* of God, Christ is the Law of Christ in typological fulfillment of the Law of Moses. To argue in this manner not only misses John’s theological intent but also serves as an example of typology misused.⁴⁵

The Implications of Picture-Fulfillment NCT

Can God be Ontologically Reduced to ‘Law’?

One unintended consequence of the Picture-Fulfillment NCT teaching that both Christ and the Spirit literally are the Law of Christ is that the Second and Third Persons of the Trinity can be ontologically reduced to ‘law’. How can the Lord Jesus Christ, who is fully God and fully man, be ontologically reduced to the Law of Christ, a law which will pass away at His return? How can the

⁴²See Michael Heiser, “An Unexpected Word” (Chapter 3 from an unpublished book) accessed 7 October 2011; available from <http://www.thedivinecouncil.com/Introduction%20to%20the%20Divine%20Council%20MTIT.pdf>; Internet.

⁴³Other passages in the Jewish Targums where the Aramaic *mymr* (מִימַר) occurs are the following: Gen 3:8, 10; 6:6-7; 7:16; 8:21; 9:12-13; 15:1, 6; 17:2, 7, 10, 11; 20:3; 21:20, 22-23; 22:16; 24:16; 24:3; 26:3, 5, 24, 28; 28: 15, 20; 31:3, 49, 50; 39:2-3, 21, 23; 48:21; 49: 24-25; Exod 2:25; 3:12.

⁴⁴Even though the Jewish Targums were an Aramaic translation of the Hebrew Scriptures in use at the time of Christ and the Apostles, they do not constitute an inspired or inerrant transmission of the OT text. Thus, although the Targum translators substituted “His Word” in Isaiah 48:16 for the MT’s “His Spirit,” it would be *theologically perilous* to infer from their translation that the Holy Spirit is also the Word of God, a title exclusively used of Christ in the NT.

⁴⁵This is not an isolated example of the misuse of typology. See Bresson, “The Incarnation of the Abstract,” 17. Bresson argues that abstract ideas can also “be brought forward” as types. He states: “Abstract ideas could be brought forward as well. Christ has put flesh and bones on God’s Wisdom. Christ is our Incarnate Righteousness (having obeyed the Law on our behalf). Christ is the Incarnate Truth (which, it should be noted, also has connotations of Torah in John, but I digress). Christ is the Incarnate Life. All of these abstract ideas can be found as types in the Old Testament, and an intelligible correspondence can be established. Christ, the Antitype, has put flesh and bones on the Truth. When Christ says, “I am the Truth”, he isn’t simply making a metaphorical analogy to help his disciples understand a little more about Christ’s relationship to things that are Truth or even the Truth that comes from God. Nor is Christ, as is a popular way of saying it today, telling his disciples that they can believe every word he says because he will always speak the truth. No, this is the I AM who appeared to Moses in the burning bush standing in front of his disciples, in oneness with his Father, declaring himself to be the living and breathing enfleshment of the eternal reality, Truth, that has spoken all things into existence. Christ is making a sociological, philosophical, epistemological, soteriological, and yes, eschatological proposition about himself. Christ is the embodiment of an abstract idea, so that he in and of himself is everything one could say about the idea of Truth.” However, to state that Christ is the incarnation of God’s Wisdom or His Truth is *not* typology; it is merely the final manifestation of God’s Wisdom or His Truth. For example, to understand Christ’s incarnation of God’s wisdom as the fulfillment of a typological relationship would imply that God’s Wisdom was previously incomplete, mutable, temporary, not perfect, and now with the coming of Christ, God’s Wisdom is now obsolete. ***The antitype not only always makes its type obsolete but also always surpasses its type in significance, glory, and meaning by a vast, if not infinite, degree.***

Holy Spirit, the Great Applier of our so-great salvation, also be ontologically reduced to the temporary law of the NC? *In short, They cannot.* Christ is the Lord, Mediator, Lawgiver and Surety of the New Covenant, not the covenant itself nor its law. The Holy Spirit is the Divine Agent who brings about a NC believer's willing obedience (Ezek. 36:27) by giving him a new heart (Ezek 36:26). Moreover, how can the Triune God, who is infinite, be ontologically equated with the temporary Law of Christ? *In short, He cannot.* Although law is a *reflection* of God's perfect character, it is not the substance of His Persons, Character, or Essence. *God must be seen as transcending His law.* For example, Ephesians 4:28 declares that a NC believer is not to steal but work honestly. God cannot steal, since He possesses all things as the Sovereign Creator. Again, numerous NT passages command a NC believer to not lie (e.g. Jas 3:14; 1 John 2:21). God cannot lie, because He is the embodiment of truth (Titus 1:2). In conclusion, these Picture-Fulfillment NCT teachings are overly reductionistic and without scriptural warrant.

Are Believers Ontologically Made One in Nature With Christ and the Holy Spirit?

An unintended consequence of the Picture-Fulfillment NCT teaching that both Christ and the Spirit literally are the Law of Christ is that NC believers are ontologically made one in nature with the Second and Third Persons of the Trinity. Consider again a comment made by Steve Fuchs:

I would add that when we understand Christ to be the Law, we are really saying the Spirit of Christ...aka the Holy Spirit, while attempting to not short-change the 'oneness' between those two persons of the Trinity. Christ becomes Law, a Law that causes righteousness to be manifest in His people, by indwelling them as Holy Spirit. ***He and the Spirit are one, and in the same way we are made one in nature with them by their indwelling us.***⁴⁶ [emphasis mine]

This conclusion appears to result from the following line of reasoning: If both Christ and the Holy Spirit are the Law of Christ and if the Holy Spirit indwells us by being 'the law written upon our hearts', then the nature of both Christ and the Spirit is communicated to us, and we are made one in nature with the members of the Godhead. This is a theologically perilous line of argumentation. It is undoubtedly true that Christ (in His Divinity) and the Spirit are one, since both wholly share the same Divine Essence. It is also undoubtedly true that we are united to Christ through the indwelling Holy Spirit (cf. Gal 2:20). However, Christ and the Holy Spirit cannot be ontologically equated with the covenantal law of the NC. Furthermore, NC believers will *never* be made like God or become one in nature with the members of the Godhead. When the Lord Jesus returns in glory at the end of the NC age, we will be "conformed to the image" of Christ (Rom 8:29-30), and "we will be like Him" (1 John 3:2). However, these verses do *not* teach that NC believers will be ontologically made one in nature with the members of the Godhead. Rather, they teach that NC believers will be conformed to Christ's glorified humanity, when they receive their glorified, imperishable resurrection bodies at His return.

Why Picture-Fulfillment NCT?

At this particular point, we must ask, "Why do these fellow Bible-believing Christians deem it necessary to ontologically identify Christ as the New Covenant and its Law, and the Spirit as the law written upon the heart?" They do so, because their writings clearly imply that *any* definition of the Law of Christ identifying it as a list of external, biblical imperatives is a manifestation of Christian moralism, perhaps even legalism. Consider the following quotations in light of one another:

⁴⁶Fuchs, "The Various Branches of New Covenant Theology," comments added on March 7, 2009 at 4:17 PM.

That the Law is a Person means the Law of the New Covenant is not encoded in external imperatives or principles.⁴⁷

The Law Incarnate has placed a Person, the Holy Spirit, within the believer as the law written on the heart. That's the upshot of 2 Corinthians 3's understanding of Jeremiah 31. The law written on the heart should not be identified in its typical form, but its Antitypical... a Person, living and breathing life into and through the New Covenant member. The entire law "category", as it moves from Old Testament to New, lands on a person. The trajectory of the fulfillment of the law does not land on a new set of rules or principles, or even a summarized list of the law of Christ. The Law as a type has its end in Christ. The law as a type fades away into oblivion because all types do... it has become a person.⁴⁸

The Law as the Incarnate Christ means life change that is imperative-focused or imperative-driven is simply Christianized behaviorism. Stripping the imperatives from the Indicative (or simply always presuming the Indicative) results in an inherent moralism in our preaching and teaching. Allowing the Word to eclipse THE WORD results in an inherent bibliolatry.⁴⁹

An Incarnate Law means the wrong questions are being asked in contemporary New Covenant Theology's community. The question isn't what is it I must obey, but who obeyed and died in my place and how does my union with him work itself out in my life? The question is not whether imperatives have a role in the New Covenant, but the question is what role do they occupy? The question isn't what are the five points of the law of Christ, but what is the nature of the law of Christ and how is it manifest in the life of the church? The question isn't whether personal holiness is important, but what is the nature and motivation of personal holiness?⁵⁰

Is it true that *any* definition of the Law of Christ⁵¹ which identifies it as a list of imperatives⁵² is a manifestation of Christian moralism? I do not believe so. Is it possible to avoid Christian moralism, while not affirming the defining distinctives of Picture-Fulfillment NCT? Yes, I resoundingly affirm that it is *not* necessary to subscribe to the novel teachings of Picture-Fulfillment NCT in order to avoid moralism and a hyper-focus on law-keeping. So, how does one accomplish this? First, a believer must recognize and believe that it is the Holy Spirit who causes his willing obedience (Ezek. 36:27; Phil 2:13) and empowers him to follow God and keep His inscripturated commandments. Second, a believer must maintain a *biblical* balance between the New Testament indicatives and the imperatives of the Law of Christ, ever realizing that the NT indicatives provide his or her motivation to obey. The Holy Spirit through God's inscripturated Word informs and teaches *all* NC members *how* they are to obey Jesus Christ, the Risen Lord and the Creator King of the universe. As a result, neither the ministry of the Holy Spirit nor Scripture are to be minimized in any way, no matter how slight.

⁴⁷Bresson, "The Incarnation of the Abstract," 20.

⁴⁸Ibid.

⁴⁹Ibid., 22.

⁵⁰Ibid., 21.

⁵¹Again, this author believes that the most accurate definition (to date) of the Law of Christ appears in White's *The Law of Christ*. On page 154, White defines the Law of Christ in the following manner: "It is the law of love, the example of our Lord Jesus Christ, the teaching of Jesus, the teaching of the New Testament, and finally the whole canon interpreted in light of the Christ event."

⁵²See Schreiner, *40 Questions*, 204-5. Regarding the citation of Jeremiah 31 in Hebrews 8, Schreiner writes, "The author cites the new covenant promise of Jeremiah 31:31-34 that the law will be written on the heart of believers (Heb. 8:7-13). The author does not work out what the law written on the heart would mean in terms of giving specific prescriptions from the law. He clearly believes there is a place for commands and injunctions, as we learn from the parenthesis in chapter 13. What he emphasizes, however, is that the cleansing of sins has been achieved once for all through the death of Christ."

Although advocates of Picture-Fulfillment NCT are not to be classified as antinomians since none of them reject the NT imperatives, they apparently do not recognize that both their minimizing of those same imperatives and their failure to properly define the Law of Christ constitutes an unintentional, yet dangerous, movement toward antinomianism. This particular strain of NCT bears strong resemblance to the antinomian approach of Gysbert M. H. Loubser, who writes:

In as much as law has no salvational role in his life, it also has no ethical roll. The believer receives the Spirit by faith in Christ. The Spirit who quickens new life in him, orientating him to Christ, also guides and enables him to do God's will according to Christ's faithfulness... Thus, the believer's ethic of freedom is fully christological-pneumatological and anomistic without being libertinistic at all. Believers should not fear their God-given freedom by reverting to any form of law observance, but rather celebrate it by trustingly and freely walking in step with the Spirit.⁵³

Elsewhere, Loubser states:

The Spirit does not orientate the believer to a form of law according to which he is to live, but to Christ whose faithfulness sets him in the new aeon which is free of flesh's dominance, and provides him with the example of faithfulness to God's will. The Spirit guides the believer and enables him to do God's will and serve his neighbor in love.... The christological-pneumatological ethic of freedom is essentially anomistic, but not libertinistic.⁵⁴

Although the Picture-Fulfillment NCT view of 'law' should not be fully equated with that of Loubser, his view not only is very similar to the former but also *may* very well be its logical end state.

Conclusion

The recent development known as Picture-Fulfillment NCT, although novel in its approach, cannot be viewed as a positive or worthwhile contribution or development in NCT. Why? *First, contrary to Picture-Fulfillment NCT teaching, Christ is not the New Covenant.* Isaiah 42:6 and 49:8 cannot be legitimately interpreted to ontologically equate the Lord Jesus with the New Covenant. Christ is the Lord and mediator of the New Covenant; He does not incarnate the New Covenant. *Second, contrary to Picture-Fulfillment NCT teaching, Jeremiah 31:31-34, Ezekiel 36:24-27, and 2 Corinthians 2:14-4:6 do not teach that the Holy Spirit is the law written upon a believer's heart.* Regarding Jeremiah 31:31-34 and Ezekiel 36:24-28, to equate "my Spirit" of Ezekiel 36:27 with "my law" of Jeremiah 31:33 results in both an exegetical and logical fallacy. Furthermore, it neither logically nor exegetically follows that Paul seeks to contrast "the letter" (i.e. the Mosaic Law) and "the Spirit" as two forms of 'law' in the final clause of 2 Corinthians 3:6. Rather, Paul is contrasting two redemptive-historical eras via their respective covenants in order to demonstrate the New Covenant's superiority over the Old Covenant. The Spirit is not the law written upon a believers' hearts, but as part of His New Covenant ministry, He Himself places a new heart in **all** members of the New Covenant, thereby *causing* them to *willingly* obey God and keep His *inscripturated* commandments (i.e. the Law of Christ). *Third, contrary to Picture-Fulfillment NCT teaching, Christ is not the Incarnated Law of the New Covenant.* The law-covenant connection, as taught by John Reisinger, does not logically support this Picture-Fulfillment NCT teaching, since Isaiah 42:6 and 49:8 cannot be legitimately interpreted to ontologically equate the Lord Jesus with the New Covenant. Furthermore,

⁵³Gysbert M. H. Loubser, "The Ethic of the Free: A Walk according to the Spirit! A Perspective from Galatians," *Verbum et Ecclesia JRG* 27:2 (2006): 614.

⁵⁴*Ibid.*, 637-8.

to insist that Hebrews 10:1 and John 1:1, 14, 16-18 declare Christ to be the antitypical NC equivalent of the OC Law of Moses is to make a false inference by eisogating Picture-Fulfillment NCT presuppositions into the text. Although the Lord Jesus Christ *is* both the NC Lawgiver and the Great Exemplar of the standard within the Law of Christ, He is not the Law of Christ in any ontological sense.

In conclusion, proponents of Classic NCT do have legitimate cause for concern with the rise of this novel NCT strain: the significant deficiency of biblical exegesis displayed in these Picture-Fulfillment NCT teachings poses a genuine danger to Classic New Covenant Theology. It is also *too early* for Picture-Fulfillment advocates to describe New Covenant Theology as “classic,” since NCT is still being established as a theological system. Christ cannot be ontologically equated with the New Covenant, and neither He nor the Spirit can be ontologically equated with the Law of Christ. These Picture-Fulfillment NCT teachings are overly reductionistic, unintentionally resulting in the teaching that NC believers are ontologically made one in nature with the members of the Godhead. Additionally, these teachings *may potentially* contribute to the emergence of a new form of Sabellianism *if* the personal distinctions within the Trinity are obscured. Furthermore, Picture-Fulfillment NCT’s failure to properly define the Law of Christ constitutes an unintentional, yet dangerous, movement toward antinomianism. It is *not* necessary to subscribe to the novel teachings of Picture-Fulfillment NCT in order to avoid moralism and a hyper-focus on law-keeping. Classic NCT and Picture-Fulfillment NCT are incompatible strains of NCT, since there are *significant* mutually excluding distinctions between the two. The Holy Spirit is *not* Himself the internal law of the heart, but He is the One who causes a believer’s willing obedience (Ezek. 36:27; Phil 2:13) by giving him a new heart (Ezek 36:26) which seeks to follow God and keep His inscripturated commandments (i.e. the Law of Christ). Christ is not to be obeyed because He is the law or the New Covenant in an ontological sense. He is to be obeyed because He is the King of the New Covenant, and His Word is the Law of Christ.

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