

The Truth Judge or the True Judge?

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1 Introduction

The blessing *ברוך דין האמת* (*barukh dayan ha-emet*) is said as part of a death announcement and during the mourner's ritual of *k'riah* (tearing one's clothing, or a piece of ribbon). These days, *ברוך דין האמת* is often translated as "Blessed is the True Judge." However, in the earliest use of the blessing, it meant something that can be [ENX] translated as "Blessed is the Truth Judge." The two translations of the blessing have significantly different meanings. This article discusses implications of the two meanings and their relations to Jewish theology about life, death, and transgressions.

2 The Issue

The phrase *דין האמת* is often translated in Rabbinical sources, on the pulpit, and at funerals as "the True Judge." [ENY]. However, in modern Hebrew,

1. "true judge" would be *דין אמת*, and "the True Judge" would be *הדין האמת*; in these phrases, "true" is an adjective, as is *אמת*,
2. *דין האמת* is a construct (סמיכות) form made of two nouns, *דין* ("judge") and *אמת* ("truth"), plus the definite article *ה* ("the"), which together mean "the Truth Judge" [EN0]

Thus, in modern Hebrew, "the True Judge" would not be a correct translation of *דין האמת*, and *דין האמת* would be translated as "the Truth Judge."

The difference between "the True Judge" and "the Truth Judge" is that

1. a true judge is a judge who is worthy of the title "Judge", while
2. a truth judge, or a judge of the truth, *decides* what *is* the truth, perhaps by the judge's very actions.

A truth judge can decide also if what someone is saying is the truth. This interpretation is the subject of Section 6 of this article.

This simple explanation of the different meanings is in modern Hebrew, which has an adjective form *אמת* that is derived from the noun *אמת* by adding *י*, that allows the two meanings to be expressed as two different phrases in modern Hebrew. However, Biblical and Rabbinical Hebrew did not have this adjective. In fact, as explained in Section 2.3, Biblical and Rabbinical Hebrew would have conveyed both meanings with the same *דין האמת*. The section identifies and explains the first use of *ברוך דין האמת*, in the Mishna. In the meantime, Sections 2.1 and 2.2 explain the different meanings in two other contexts.

2.1 The Comic Comedy Teacher

The difference between “the True Judge” and “the Truth Judge” is the same as the difference between “the comic teacher” and “the comedy teacher.” The adjective “comic” means “causing or meant to cause laughter” or “relating to or in the style of comedy,” and the noun “comedy” means “entertainment consisting of jokes and satirical sketches, intended to make an audience laugh.” [A1] A comedy teacher is focused on teaching comedy, while a comic teacher may be teaching anything, but in a comic manner. Taking mathematics as an antithesis of comedy and “serious” as the opposite of “comic,” one can have (1) the comic comedy teacher, (2) the serious comedy teacher, (3) the comic mathematics teacher, and (4) the serious mathematics teacher. These are all very different kinds of teachers.

2.2 Democracy vs. Dictatorship

Another way to see the difference between “the Truth Judge” and “the True Judge” is to compare democracies and dictatorships. In a democracy on Earth, the supreme court consists, we hope, of some true judges, each of whom judges against a truth established by the traditions, common law, and statutes enacted by the designated collective truth judge, that is, those who decide what is the truth, in the democracy: namely, the legislature, representing the will or collective wisdom of the people. Generally in a democracy, it is debatable whether the supreme court, populated by true judges, is allowed to legislate from the bench, to be the truth judge.

In a dictatorship, the truth judge is *the* dictator, as appears to be in North Korea, or a small committee, as appears to be in China and Russia. In these places, true judges in the court system learn to bend to the truth established by the truth judge, or else they suffer capital consequences. Thus, the true judges become true to the truth judge.

2.3 History of the Blessing

In contrast with modern Hebrew, Biblical and Rabbinical Hebrew, which are used in the Tanakh and the Mishna, have few adjectives formed by adding ך to a noun, as אמת is derived from אמת [K2]. The earliest such adjective in the Tanakh is אדמוני derived from אדמון, in Genesis 25:25, but אמת itself does not appear anywhere in the Tanakh. As a result, whenever an adjective would have been needed, a construct form with two nouns would have been used instead. That is, in Biblical or Rabbinical times, one wanting to say either “the True Judge” or “the Truth Judge” would say אמת דין and would depend on context to express the intended meaning.

According to the Hebrew Academy in Israel, the earliest appearance of the word אמת is between 1100 and 1300 CE [A0]. The earliest occurrence of the phrase אמת דין appears to be in the Mishna B'rakhot 9:2 [S1], which was written and edited by Yehuda HaNasi in about 200 CE,

long before *האמת* appeared in Hebrew. Thus, any occurrence of *דין האמת* in the Mishna is ambiguous and a reader needs to examine its context to understand the occurrence. This first occurrence says *ועל שמועות רעות אומר ברוך דין האמת*, which therefore, means either

1. “And for bad news, one says ‘Blessed is the True Judge.’” or
2. “And for bad news, one says ‘Blessed is the Truth Judge.’”

The first possibility does not fit, because in this situation, there is nothing and no one to judge. The bad news has already happened. No true judge needs to be available to do some judging and to be blessed for doing so. However, evidently God, the Decider of what is true, and therefore the Truth Judge that we must live with, has decided that the bad news needed to happen. We humans need to accept the truth of the bad news. We need to show that we accept it by blessing the one who caused it to happen, even if we feel sad about or are angry about the bad news. This early occurrence of *דין האמת* clearly means “the Truth Judge” and not “the True Judge.” Among the possible bad news is, of course, the death of a close relative. Thus, this blessing came to be said in the immediate aftermath of the death of a close relative.

2.4 Occasions of Judging in a Jewish Life and Death

In Judaism, God judges a person’s behavior annually, when the person is alive, on Rosh Hashana, which is known also as *יום הדין*, the Day of Judgment. Thus, there is no need to judge a person on the person’s death [ENJ]. The person’s death occurs after the judgment that God made about the person during the most recent Rosh Hashana, the judgment that God sealed later at the end of the same year’s Yom Kippur [MC]. Of course, the point of the Ten Days of Awe, from Rosh Hashana through Yom Kippur, is that with suitable repentance during these ten days, God’s judgment can be modified before it is sealed at the end of Yom Kippur.

That *דין האמת* has nothing to do with judging a person is confirmed by the fact that in all the various versions of the High Holiday machzorim available at Sefaria and from the CCAR there are very few occurrences of the word *דין*, with *none* of them being part of the phrase *דין האמת*. Among the machzorim for Rosh Hashana at Sefaria [S2], the sole occurrence that matches *דין* is in the Machzor Rosh Hashanah Ashkenaz in a prayer titled “Annulment of Vows”, that serves as a Kol Nidre for Rosh Hashana, in

שמעו נא רבותי, דינים ממהים, כל נדר ...

“Listen my masters, expert judges! Any vow”

This occurrence is not even singular and thus cannot be God. Also, it is not part of any *דין האמת*.

In the CCAR Rosh Hashana Machzor, neither of the two occurrences of *דין* is part of *דין האמת* [CC]. They are in Untaneh Tokef. One is

אמת פי אתה הוא דין, ומוכיח ויודע ועד,

which means “It is true that you are judge, prover [prosecutor?], knower [jury?], and witness” [AT] . The second is

וַיֹּאמְרוּ: הֲנֵה יוֹם הַדִּין,

which means “And they will say ‘Here is the Day of Judgment.’” Neither is nor has דִּין הָאֱמֶת.

The Untaneh Tokef prayer, in which God gives humans the opportunity to judge themselves, says:

וְחֹתֶם גַּד כָּל אָדָם בּוֹ

“the signature of each person is here,”

referring to סֵפֶר הַזְכוּרוֹת, the Book of Memories. The prayer says also:

וְכֹל בָּאֵי עוֹלָם יַעֲבִירוּן לְפָנֶיךָ ... וְתִכְתֹּב אֶת גְּזֵר דִּינֵם

“And all comers to the world will pass before You ... You will write their judgment decrees.”

That is, judgment comes during a person’s *lifetime*, during the Ten Days of Awe, and not when the person is no longer alive.

Thus, in Judaism, דִּין הָאֱמֶת does not appear in the context of God’s judging human beings, on Rosh Hashana; דִּין הָאֱמֶת is not describing the True Judge, God’s role on Rosh Hashana, the Day of Judgment. דִּין הָאֱמֶת is used only in response to hearing of a death or other bad news, when דִּין הָאֱמֶת is describing the Truth Judge that has decided that the death or other bad news needed to happen.

3 Implications of the Difference in Judaism

Let us look at the two possible meanings of בְּרוּךְ דִּין הָאֱמֶת in the context of when it is usually said, in a death announcement: for example, “Shahar (שַׁחַר), Z.L., died this morning after a long battle with cancer. בְּרוּךְ דִּין הָאֱמֶת. May Shahar’s memory be a blessing.”

1. If בְּרוּךְ דִּין הָאֱמֶת is taken to mean “blessed is the True Judge,” the announcement implies that Shahar will somehow be judged by God, the True Judge. Why would Shahar be judged at this point, at Shahar’s death? It is hard to think of a reason for a judgment at this time other than to make some decision about what will happen to Shahar after death as a function of how Shahar acted during Shahar’s life.

2. If בְּרוּךְ דִּין הָאֱמֶת is taken to mean “blessed is the Truth Judge,” the announcement is saying that no matter how unjust or not right we humans might think Shahar’s death is, it is the truth — because whatever God does, as the Truth Judge, is the truth. The announcement’s purpose is to convince Shahar’s mourners to accept the reality of Shahar’s death as that of God’s enacting with great power, the power that is the truth, the power that is extolled when we then say the Kaddish in honor of the deceased: יִתְגַּדַּל וְיִתְקַדַּשׁ שְׁמֵהּ רַבָּא “Enlarged and sanctified is the great name.”

The “True Judge” translation implies the existence of an afterlife and some kind of reward for good behavior during life, for which each deceased must be judged upon death. However, Jewish theology is ambiguous and uncertain about what happens after death [URJ]. On the other hand, Christianity is certain of the existence of the afterlife, with its reward in heaven or punishment in hell for a deceased’s behavior in life [F2, C1]. Therefore, the “True Judge” translation, in effect, invokes concepts that are uncertain and vague in Judaism itself, but are certain in the Christian culture that most diaspora Jews now live in.

In Christianity, upon Shahar’s death, Shahar’s life is judged by the True Judge against established moral standards. If Shahar is judged to have lived a worthy life, Shahar is admitted to heaven for all eternity. Shahar’s soul is saved. If not, Shahar is consigned to hell for all eternity. So, the usual Christian blessing is “May Shahar’s soul rest in peace,” which is possible only if Shahar’s soul ends up in heaven [ENR].

In Judaism, each death reminds us that God’s actions *are* the truth. There is no certain notion of saving Shahar’s soul from eternal damnation in a fiery hell. Shahar lives on only in the memories of Shahar’s survivors. Thus, Jews say “May Shahar’s memory be a blessing” and not “May Shahar’s soul rest in peace.” Therefore, בְּרוּךְ דֵּין הָאֱמֶת, understood as “Blessed is the Truth Judge,” fits very well with what is certain in Jewish theology.

During a funeral, mourners say both the blessing בְּרוּךְ דֵּין הָאֱמֶת and the mourner’s Kaddish. Thus, we might expect a certain consistency between them. The mourner’s Kaddish has nothing to do with death, the deceased, and even mourning. It is about God’s great name, שְׁמֵהּ רַבָּא, which should be observed בְּעֻלְמָא דִּי בְּרָא כְרַעוּתָהּ “throughout the world which He [EN1] has created according to His will.” Creating the world “according to His will” is what causes the Creator to be the Truth Judge. Whatever the Creator creates *is* the truth. The “Blessed is the True Judge” interpretation just does not fit with the meaning of the mourner’s Kaddish.

To conclude, בְּרוּךְ דֵּין הָאֱמֶת is blessing the one God who establishes, by God’s actions, what *is* the truth. In the case of a death, when בְּרוּךְ דֵּין הָאֱמֶת is usually said, בְּרוּךְ דֵּין הָאֱמֶת is making it clear to us humans that no matter how unjust, unfair, painful, senseless, wasteful, etc., we might think the death at hand is, no matter how we might not understand any purpose to the death, it is God’s truth.

4 Main Difficulty with the “True Judge”

Understanding of דֵּין הָאֱמֶת

The main difficulty with understanding דֵּין הָאֱמֶת as “the True Judge” is that God’s being only the True Judge that judges the deceased’s life, does not fit well with the blunt purpose of the prayers,

such as *צדוק הדין*, in which *האמת* occurs. This lack of fit is emphasized by the total absence of *האמת* in the *צדקתה צדק* prayer, which replaces *צדוק הדין* when it would be too blunt.

4.1 The *צדוק הדין* Prayer

One of the prayers said during and only during a funeral, just after the grave has been filled, is *צדוק הדין* [G3], whose name is often translated as “Justification of Judgment.” In this prayer one finds:

- *ברוך דין האמת ממית ומחיה*, “Blessed is the Truth Judge who causes death and brings to life,” and
- *ברוך הוא כי אמת דינו*, “Blessed is He, because truth is His judgment” or “Blessed is He, that truth is His judgment.” [EN3]

These verses make it clear that the *אמת*, truth, is the death that the funeral is about. Other verses remind the mourners at the funeral that despite the death that they consider not righteous, God is, nevertheless, *צדיק*, righteous, and what God does is *צדק*, righteousness:

- *צדיק אתה יי להמית ולהחיות אשר בידך פקדון כל רוחות*, “You are just, Adonai, in killing [EN2] and resurrecting what is in Your hand, the depository of all spirits,”
- *ידענו יי כי צדק משפטך*, “We know, Adonai, that righteousness is Your decrees,” and
- *צדיק אתה יי וישר משפטך*, “Just are You, Adonai, and straight are Your decrees.”

Two other verses mention both *אמת*, truth, and *צדק*, righteousness, and remind the mourners that the Truth Judge does both, and one even blesses that Truth Judge:

- *דין אמת שופט צדק ואמת*, “Truth Judge, you govern righteousness and truth,”
- *ברוך דין האמת כי כל משפטיו צדק ואמת*, “Blessed is the Truth Judge, all His decrees are righteousness and truth.”

Every mention of *האמת* or *אמת דינו* in *צדוק הדין* is in the context of the *אמת*, truth, being the death that the funeral is about. Understanding *האמת* as “the True Judge”, the True Judge that judges the deceased’s life, just does not fit the prayer’s purpose of accepting this death as God’s truth.

A commentary about *צדוק הדין* that is associated with understanding *האמת* as “the Truth Judge” tends to stick to the main theme of our accepting God’s judgment in the form of the death we are mourning now. For example, the Rabbinical Assembly’s *Rabbi’s Manual* includes a suggested English paragraph to be read to explain *צדוק הדין* to those attending a funeral [R2, p E-58]:

In this reading, rich with biblical verse, we express our sense of resignation and our continuing faith in God, despite the pain and loss we feel. The death we have witnessed is beyond understanding. Still we take comfort in our faith that God’s compassion will continue in our lives. We take comfort in the immortality of the soul, binding our beloved with us in an eternal bond of life.

A commentary about *צדוק הדין* that is associated with understanding *האמת* as “the True Judge” has a harder time driving home this harsh point.

4.2 The צדקה צדקה צדקה Prayer

When דין האמת is understood as “the Truth Judge”, the צדוק הדין prayer is an extremely blunt prayer that holds no blows. It says very simply that God is the arbiter of both the very harsh truth of death and righteousness in general. It says that when it comes to a death, the truth aspect of God stands out, and we have to accept it, no matter how unrighteous the death may seem to us. At all other times, the righteousness aspect of God stands out.

The צדוק הדין prayer is so blunt that there are times, even during a funeral, in which it is prohibited to say it. For those occasions, the less blunt צדקה צדקה צדקה prayer, focusing on only God’s merciful righteousness, is to be used. The צדקה צדקה צדקה prayer is regularly said during the Shabbat Mincha, after the Amidah and before the full Kaddish to remind the worshippers that the tradition says that Moses died on Shabbat and God buried him on Shabbat. צדקה צדקה צדקה is said in place of צדוק הדין, which cannot be said on Shabbat. In general, צדוק הדין cannot be said whenever תהנון is not said. The main circumstances in which צדוק הדין is not said are days of public joy, such as holidays or Shabbat, and days of personal joy such as betrothals, weddings, britot, b’nei or b’not mitzvah, and other simchot. These days are just not consistent being reminded of the truth aspect of God. The other circumstances under which צדוק הדין is not said are at the funeral of a child under 30 days, and in some communities, at the funeral of any young child. These funerals are so tragic for the child’s family that their being reminded of God’s blunt truth aspect is considered too distressing.

A comparison of the contents of צדקה צדקה צדקה with those of צדוק הדין shows the צדקה צדקה צדקה is much more merciful than צדוק הדין. Our literal translation of צדקה צדקה צדקה is:

Your righteousness is righteousness forever; and your law is truth. And God’s righteousness is until sky. That which you did are big, God. Who is like you? Your righteousness is like God’s mountain. Your decrees are much depth. Man and beast, Lord will save.

This prayer focuses on God’s צדקה, righteousness, which is mentioned several times. Its only reference to אמת, truth, is that of the Torah or the law in general. There is *no* mention of the very harsh truth of God’s judgment, the death that is the subject of the funeral in which the prayer might be said.

This distinction is borne out by the prayers’ titles. The title of צדוק הדין is “Righteousness of the Judgment,” the judgment that is the death. The title of צדקה צדקה צדקה is “Your Righteousness is Righteousness,” i.e., your righteousness defines what righteousness is.

5 Possible History of the Origin of the “True Judge” Misunderstanding

Judaism has always been ambiguous about what happens after we humans die.

Death forms the final chapter of life “in this world” and the opening page of life “in the world to come.” In no way is death evil or unnatural, a penalty exacted for sin. True, death before one’s time, understood in the oral Torah to be sixty years, is deemed “extirpation,” that is, premature death, and under some circumstances is deemed penalty for sin [N1].

Judaism is famously ambiguous about this matter. The immortality of the soul, the World to Come, and the resurrection of the dead all feature prominently in Jewish tradition, but exactly what these things are and how they relate to each other has always been vague [M2].

In particular, there is no clarity on what happens to one’s soul between the body’s death and the world to come, עולם הַבָּא, and the soul’s resurrection when the Messiah comes in the far future.

The Tanakh itself mentions only *שְׂאוֹל*, meaning the bowels of the earth. The word *שְׂאוֹל* was used in the early Tanakh to mean mainly the grave itself, particularly when one is sent to the grave early. Later, the term is used to describe the temporary place for souls in between the death and the resurrection in the world to come.

The idea of *גֵּן עֵדֶן* and *גֵּיא הַנֶּחֱמָה*, also called “heaven” and “hell” respectively, were developed later. However, it was never clear how hell was different from heaven and to what extent the soul of sinners are confined to hell, because fundamentally, Mishnah Sanhedrin 10:1 assures us that *כֹּל יִשְׂרָאֵל יֵשׁ לָהֶם חֵלֶק לְעוֹלָם הַבָּא*, “All Israel has a portion in the world to come” [S3]. So, people’s sins should have no bearing on their being able to enter the world to come.

Given this assurance, a funeral serves no particular need of the deceased other than seeing that the deceased gets buried so that the deceased’s body can return, as commanded, to dust. The focus of the funeral then becomes to serve the needs of the mourners. First and primary is the need for the mourners to accept the death as God’s plan. Mourner say *בְּרִיךְ הוּא הַאֱמֵת*, “Blessed is the True Judge,” to remind themselves that regardless of what they may think of the death, it is God’s truth. The mourners later say Mourner’s Kaddish, acknowledging the greatness and holiness of the name of God who has just taken the life of their loved one.

Independently of the concern about death and funerals, the Torah proclaims in several places that a person’s good behavior will be rewarded, and the person’s bad behavior will be punished, all during the person’s lifetime. For example, in Parshat Bechukotai in Leviticus 26:3–43, God promises the Israelites that if they keep God’s commandments, they will be prosperous and

secure in their land. If, on the other hand, they ignore their covenant with God and violate the commandments, their land will not yield crops, their enemies will persecute them, and they will be exiled. These calamities are supposed to happen while they are living and not after they die.

It did not take long for Israelites to notice that what God promised did not happen [F2]. As Vinson Cunningham said in a paraphrase of Dorothy Day in her *The Long Loneliness*, just the opposite happens: “Why are some people caught and not others? Why do the ‘least of these’ keep catching hell while the richest and most powerful slide through life unaccosted and unaccountable, leaving God knows what in their wake?” [C1, DD]

We believe that widespread thinking like this prompted Jewish religious leaders to introduce into the theology the idea that the deceased’s soul, which leaves the deceased’s body on death and just waits until the Messiah comes and initiates resurrection, thus receiving the reward or punishment for the deceased’s behavior during life. This would lead to the concepts of עֲדֵן הַשָּׁמַיִם, heaven, and גֵּיאַ הַחַיִּים, hell, as the reward or punishment destinations for the deceased’s soul [F2, EN8, EN9].

Once the concepts of heaven and hell have been introduced and there is a need for each deceased’s life to be judged to determine the destination of the deceased’s soul, the understanding of דֵּין הַאֱמִתּוּת as “the True Judge” at least makes some sense, even though this sense depends on concepts that are not certain, that are debated, and that came into Judaism only in Rabbinical times. Now we hope that the one who judges each deceased’s life is a true judge. This hope would reinforce the uncertain understanding as a reasonable understanding.

6 Human Responsibility

This article has so far focused on one understanding of “Truth Judge,” that is, as the *decider* of what *is* truth. So a death, decreed and enacted by God *is the truth*, even if we do not like it.

There is a simple understanding of “Truth Judge” as one who decides if what someone is saying *is* the truth. This is the role of a human judge in a trial by judges. In this understanding, God is sitting in judgment of humans, and if the phrase is said during a funeral, God is sitting in judgment of the deceased human whose funeral it is. At this judgment, the deceased stands before God to describe the deceased’s own life. The deceased must stand before God in truth, because God cannot be deceived [R1].

Thus, understanding דֵּין הַאֱמִתּוּת as “the Truth Judge” puts the responsibility for facing truth and being truthful squarely into our human hands. We humans are responsible for accepting truth even if we perceive it as bad or we do not like it. We are responsible for being truthful, i.e., having integrity.

Indeed, Chabad’s explanation of what happens after death says that after death, one’s soul, freed from the body, enters a “post-physical life in Gan Eden” [Y1]. The explanation continues[Y1]:

When the soul departs from the body, it stands before the heavenly court to give a “judgment and accounting” of its earthly life [Ethics of the Fathers 3:1, et al.]. But the heavenly court does only the “accounting” part; the “judgment” part—that, only the soul itself can do [Rabbi Israel Baal Shem Tov]. Only the soul can pass judgment on itself; only it can know and sense the true extent of what it accomplished, or neglected to accomplish, in the course of its physical life.

It adds that in Judaism [Y1],

The soul’s experience of the G-dliness it brought into the world with its mitzvot and positive actions is the exquisite pleasure of Gan Eden (the “Garden of Eden”—Paradise); its experience of the destructiveness it wrought through its lapses and transgressions is the excruciating pain of Gehinnom (“Gehenna” or “Purgatory”).

The truth hurts. The truth also cleanses and heals. The spiritual pain of Gehinnom—the soul’s pain in facing the truth of its life—cleanses and heals the soul of the spiritual stains and blemishes that its failings and misdeeds have attached to it.

So, humans are responsible to make their own hell [EN10].

The responsibility of humans is to be truthful, not just honest [EN11]. Then God, **דִּין הַאֱמֶת**, the Truth Judge, judges our truths.

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End Notes

[ENX] It can be translated also as “the Judge of the Truth”, which is considered equivalent to this article’s “Truth Judge”, just as **דִּין הַאֱמֶת** is considered equivalent to **דִּין הַאֱמֶת**.

[ENY] For example, in the **דְּיוּק הַדִּין** prayer, in the sentence

בְּרוּךְ אַתָּה יי אֱלֹהֵינוּ מֶלֶךְ הָעוֹלָם דִּין הַאֱמֶת

the phrase **דִּין הַאֱמֶת** is often translated as “True Judge” [B2, G1, G2, G3, J1, H1] and is only rarely translated as “the Judge of the Truth” [R2].

[B2] Rabbi Reuven P. Bulka, מִדְרָשׁ: *The RCA Lifecycle Madrikh* (New York, NY, USA: Rabbinical Council of America, 1995).

[G1] Rabbi Chaim Binyamin Goldberg, *Mourning in Halachah* (Brooklyn, NY, USA: Mesorah Publications, 1991).

[G2] Hyman E. Goldin, הַמַּדְרִיחַ: *Hamandrikh: The Rabbi's Guide: A Manual of Jewish Religious Rituals, Ceremonials, and Customs* (New York, NY, USA: Hebrew Publishing Company, 1939).

[G3] Zalman Goldstein, "The Jewish Burial," Chabad.org (N.D.),
https://www.chabad.org/library/article_cdo/aid/368092/jewish/The-Burial.htm.

[J1] jewish-funeral-guide.com, "Jewish Funeral Guide," (N.D.),
<http://www.jewish-funeral-guide.com/tradition/justification-ashkenazi.htm>.

[H1] הַסְּדוּר הַשְּׁלֵמִים: *Daily Prayer Book*, Translated and Annotated with an Introduction by Philip Birnbaum (New York, NY, USA: Hebrew Publishing Company, 1949).

[R2] Perry Raphael Rank and Gordon M. Freeman (Eds.), מוֹרֵה דָר, *The Rabbinical Assembly Rabbi's Manual*, כרך A (New York, NY, USA: The Rabbinical Assembly, 1998).

[EN0] The construct הַדִּין הַאֲמֵת means, in Hebrew, הַדִּין שֶׁל הַאֲמֵת, just as the noun phrase "the Truth Judge" means, in English, "the Judge of the Truth". Moreover, הַדִּין הַאֲמֵתִי is to הַדִּין הַאֲמֵת as "the True Judge" is to "the Truth Judge", in terms of the relative placements of adjectives and nouns and of words with the same root.

[A1] All definitions of English words are taken from the Apple Dictionary App, Version 2.3.0 (239.5); Apple, Inc., 2019.

[K2] David J. Kamhi, "The Gentilitial Adjective in Hebrew," *The Journal of the Royal Asiatic Society of Great Britain and Ireland* 1971, no. 1 (1971): 2--8.

[A0] The Academy of the Hebrew Language, "Hebrew--Hebrew Dictionary," (N.D.),
<https://hebrew-academy.org.il/מילון-עברי-עברי/>,
<https://hebrew-academy.org.il/keyword/מ%D6%B4ת%D6%B4%D6%BC>.

[S1] Sefaria.org, "Mishnah Berakhot 9.2," (N.D.),
https://www.sefaria.org/Mishnah_Berakhot.9.2?lang=bi.

[ENJ] In Judaism, some rabbis say that the annual Rosh Hashana judgment is enough. Others say that God judges a person on the person's death. Still others say that God will judge all soon after the resurrection of the dead following the arrival of the Messiah or the Messianic Age. Finally, others say that only non-Jews will be judged. See Section 5. See also Section “The last judgment” at https://en.wikipedia.org/wiki/Jewish_eschatology.

[MC] There is a small minority that holds that there is a final judging at the time the Messiah will come, but that will happen only ווען דער משיח וועט קומען (when the Moshiach will come).

[S2] Sefaria.org, “Machzor Rosh Hashanah Ashkenaz, Annulment of Vows,” (N.D.), https://www.sefaria.org/Machzor_Rosh_Hashanah_Ashkenaz%2C_Annulment_of_Vows?lang=bi.

[CC] Rabbi Edwin Goldberg, Rabbi Janet Marder, Rabbi Sheldon Marder, and Rabbi Leon Morris (Eds.), *משכן הנפש: Mishkan HaNefesh: Machzor for the Days of Awe: Rosh HaShanah Volume* (New York, NY, USA: CCAR Press, (2016).

[AT] authors’ translations, not CCAR’s.

[URJ] “We really do not know, but if there is a life after this one, and a reward for what we do, then surely it will be dependent upon the kind of life we have lived. Therefore, let us strive to follow God's path for us as closely and as enthusiastically as possible, for then we surely will know all manner of rewards, especially the one of seeing a world that is a better place for our efforts.” Rabbi Howard Jaffe, “In Judaism what is believed to happen to someone after they die? Is there some idea of an afterlife, or is that purely a Christian concept?” <https://www.reformjudaism.org/learning/answers-jewish-questions/judaism-what-believed-happen-someone-after-they-die-there-some>. See also Section 5.

[F2] Madison S Fogle, “The purpose of Hell: control of communities through apocalyptic literature,” College of Arts & Sciences Senior Honors Theses, University of Louisville (2022) <https://ir.library.louisville.edu/honors/292>.

[C1] Vinson Cunningham, “How the Idea of Hell Has Shaped the Way We Think,” *The New Yorker* (2019) <https://www.newyorker.com/magazine/2019/01/21/how-the-idea-of-hell-has-shaped-the-way-we-think>.

[ENR] “May their souls rest in peace” is often the translation given to וינחמו בשלום על משכבם

at the end of אל מלא רחמים. However, there is no נפשימם (their souls) in the Hebrew. So “May they rest in peace in their resting place” is a more accurate translation, meaning simply that we hope that their bodies are left undisturbed. “May their souls in peace” would be וינחה נפשימם בשלום in Hebrew.

[EN1] In direct translations of Hebrew text, “He,” “Him,” and “His” are used as the pronouns referring to God, because the original Hebrew assigns the masculine gender to God, and this article is fundamentally about translating Hebrew accurately. Elsewhere, the article assigns no gender to God.

[G3] Zalman Goldstein, “The Jewish Burial,” Chabad.org (N.D.), https://www.chabad.org/library/article_cdo/aid/368092/jewish/The-Burial.htm.

[EN2] The prayer’s use of לְהַמִּית (“to kill”) is no less shocking than God’s use of מוֹת (“Die!”) in Deut. 32:50.

[EN3] Sometimes, כִּי means “that,” and other times it means “because.” Both work in this sentence, and with no essential difference in meaning.

[R2] Perry Raphael Rank and Gordon M. Freeman (Eds.), מורה 777, *The Rabbinical Assembly Rabbi's Manual*, כרך A (New York, NY, USA: The Rabbinical Assembly, 1998).

[N1] Jacob Neusner, *Death and the Afterlife* (Cleveland, OH, USA: Pilgrim Press, 2005).

[M2] My Jewish Learning, “Is There a Jewish Afterlife?,” (N.D.), <https://www.myjewishlearning.com/article/life-after-death/>.

[S3] Sefaria.org, “Mishnah Sanhedrin 10:1,” (N.D.), https://www.sefaria.org/Mishnah_Sanhedrin.10.1?lang=bi.

[DD] Dorothy Day, *The Long Loneliness* (New York, NY, USA: Harper Collins, 1952).

[EN8] The Jewish concepts of heaven and hell, particularly of hell, is significantly different from those of Christianity, in which hell is a fiery place of eternal damnation. Jewish hell is one’s own guilt leading to eventual repentance and transfer to heaven [M2].

[EN9] The idea that people’s reward come in their afterlives can be used to keep the masses subjugated, to accept their lots in life.

[R1] The Rabbinical Assembly, the United Synagogue of Conservative Judaism, *Etz Hayim: Torah and Commentary* (New York, NY, USA: Jewish Publication Society, 2001).

[Y1] Shlomo Yaffe and Yanki Tauber, “What Happens After Death?,” Chabad (N.D.), https://www.chabad.org/library/article_cdo/aid/282508/jewish/What-Happens-After-We-Die.htm

[EN10] “There's a Jewish joke that says there's no Heaven or Hell: we all go to the same place when we die, where Moses and Rabbi Akiva give constant and everlasting classes on the Bible and the Talmud. For the righteous this is eternal bliss, while for the wicked this is eternal suffering.” conveyed by Elon Gilad of haaretz.com.

[EN11] There is a difference between truth and honesty. Lawyers must be honest, but they do not have to be truthful. Honesty and truthfulness are not the same thing. Being honest means not telling lies. Being truthful means actively making known all the full truth of a matter. A criminal defense lawyer, for example, in zealously defending a client, has no obligation to actively present the truth. Counsel may not deliberately mislead the court, but has no obligation to tell the defendant's whole story [F1].

[F1] fs, Farnum Street, “The Difference Between Truth and Honesty: What Law School Teaches us About Insight, Logic, and Thinking,” Farnum Street Articles (N.D.), <https://fs.blog/things-learned-law-school/>.

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