May 2004

Seeking Normal? Considering Same-Sex Marriage

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Like many lesbians and gay men, until recently I'd given little personal thought to marriage. It was just another one of those cultural institutions that didn't apply to me. As a sociologist, I am well-versed in the discourses by which marriage is deconstructed in order to reveal its patriarchal (read inequitable and unjust) foundations. As a sexualities scholar, I am also well aware of the many economic and legal benefits that accompany state-sanctioned definitions of family. When discussions of marriage have come up in my own long-term relationships, the impetus has been consideration of these benefits. Like many same-sex couples, my partner and I have spent thousands of dollars to file legal papers that would enable us to act on one another's behalf, secure legal recognition of our joint property, and grant power of decision in matters such as a living will.   Each of these considerations is focused around worst case, "what if" scenarios (what if one of us dies and the family tries to take away the house from the living partner? what if one of us is terminally ill and the other is not allowed to participate in medical decisions?).

The relevance of marriage ceremonies in my own life has involved the weddings of my six siblings. All lavish affairs, I have attended each in arm with my partner (and had her introduced as such to family friends and relatives). When I was contemplating a break-up, my Mormon mother (who opposed the break-up) reminded me sternly, "this is just like a divorce you know."   My parents became much more open and accepting of my

sexuality as soon as I found a nice girl with whom to take up housekeeping. Although it would never have occurred to any of my family that I should seek marriage, my partner and I at least felt some comfort in this family recognition.   Although we were acknowledged, we were still separate— separate and but not equal in the eyes of the law, and separate as two lesbians in an extended family of prolific heterosexual Mormons.   Separate and acknowledged is certainly not separate but equal.

The trouble with this equation, as many lesbian and gay families have discovered through difficult legal and social entanglements, is that when a situation of inequality exists, "acknowledgement" is at the whim of those who hold power. To borrow a phrase from the poet June Jordan, "there is difference and there is power; who has the power decides the meaning of difference."[1] The current "marriage wars" can be viewed and analyzed as a battle for the power to define complete inclusion in U.S. culture.   For many supporters of same-sex marriage, the battle is about the simple justice of being able to define one's own family and have this definition recognized and respected as a basic human right, as Paula Ettlebrick points out in this issue..[2] For others, the battle is about who holds the power to determine justice in any form—what some observers have referred to as the "just-us" justice defined by those who see themselves as the keepers of a pre-determined cultural truth.

RADICAL OR ASSIMILATIONIST?

The so-called struggle for gay marriage is additionally complicated by the fact that homosexuality is not a monolith.   Lesbians and gay men represent a full spectrum of colors, creeds, political and religious affiliations and economic circumstances.   There are lesbian and gay Republicans, lesbian and gay criminals, lesbian and gay ministers, lesbian and gay parents, and yes, some lesbians and gay men who would like to have their committed unions recognized by the state and possibly even blessed by their church.   One of the long-standing debates in lesbian and gay studies and

social movements centers on the question of "seeking the normal." There are two well-recognized discourses framing this debate. One is the argument that as marginal members of society, lesbians and gay men should push the boundaries of acceptance as far as we can by demanding recognition for even the queerest among us. The other is that assimilation is the best and most politically and socially rewarding route to general acceptance.

Both positions are strongly represented in lesbian and gay history. For instance, ACT-UP protests strove to focus public attention on the rights of HIV-positive gay men who were being discriminated against in health care on the basis of a distinctly non-normative sexuality. At the same time, Madison Avenue was actively courting lesbian and gay dollars by featuring same-sex relationships in mainstream advertising. This marketing era, now known as the "gay media marketing moment," is credited with providing an economic basis for mainstream awareness and increasing tolerance of homosexuality. In the United States, purchasing power is one route to increased political and public acceptance.[3] As advertisers realized that gay dollars were just as green as straight ones and just as likely to increase sales, mainstream media became more bold in the portrayal of lesbians and gay men. We moved from being background characters usually intended to draw laughs or convey moral missives to front-and-center TV-land companions. The appearance of shows such as Ellen, Will and Grace, Queer as Folk, and Queer Eye for the Straight Guy brought lesbians and gays into the living rooms of middle America and paved the way for mildly edgy straight-based identities such as the "metrosexual" and "lesbian chic." Around this time, in the early 1990s, some queer studies scholars began to note that the original ACT-UP chant, "we're here, we're queer, get used to it," was beginning to look more and more like "we're here, we're queer, let's go to IKEA."[4]

This assimilationist trend has had many critics. Some critiques focused on the raced (white), classed (upper-middle) and gendered (predominantly

male) demographics of those featured in the positive media representations of lesbian and gay characters.[5]   Others noted the increasing polarization between legions of lesbians, gay men, and transgendered persons who don't fit the assimilation mold (i.e., young runaways, poor, "too butch" or "too feminine" or "too queer") and those who were buying homes, expensive vehicles and seeking to have children. Critics of various lesbian and gay task forces and rights groups advocates observed that these groups seemed increasingly concerned with winning "mainstream" assimilation battles (e.g., same-sex adoption rights, military service, and religious participation) than in fighting the longstanding battles against forms of brutal discrimination that mark the daily lives of many queer folk.   The mainstreaming of some aspects of lesbian and gay life were accompanied by an increased distancing among self-described queers who either did not relate to these representations of "normalcy" or felt obligated to actively - resist the narrow definitions of acceptability they reinforced.

   Mainstream inclusion as portrayed in media an popular culture has also not only drawn resistance from some queers, but has resulted in a growing tide of backlash rising among heteronormative groups, most notably evangelical Christians.   These anti-gay groups perceive the arrival of lesbians and gay men in the media and the winning of some basic anti-discrimination legislation as signs of the proliferation of a radical "gay agenda."   This backlash has escalated into a full-blown social movement organized around attempts to legislate political and cultural exclusion. Most recently, anti-gay groups, who perceive persistent gay advancement on the cultural terrain, have drawn the line of acceptance at marriage. Amidst this climate of overt hostility and attempts to create legal discrimination, many lesbians and gay men have felt compelled to redraw the battle lines and call for a unified fight in the struggle for matrimony. The battle for legal marriage, even more than the issue of gays in the military, has forced many uneasy alliances among otherwise widely diverse individuals who claim no other commonality than shared discrimination

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along the dimension of (non-normative) sexuality. Ironically, to the extent that a "gay agenda" does exist, it can be defined as the collective spirit of defense that has coalesced *in response to* an anti-gay political movement. Most individuals who share a marginalized social position (race, ethnicity, gender, religion, sexuality) understand the quandary presented by the call for solidarity that such "anti-movements" provoke.

THE TYRANNY OF SOLIDARITY AND RHETORICAL AMBIVALENCE

In the case, of same-sex marriage, the quandary of solidarity is manifest among lesbians and gay men who begin conversations by claiming, "I really don't believe in marriage, *but* . . ." and then attempt to justify why all lesbians and gays must fight for the *right* to marry. The most common justification is framed in economic and legal terms. To date, there are 1,138 federal benefits automatically bestowed on legally married couples.[6] Certainly this is a compelling instance of social (in)justice that should be addressed. But my own observations indicate that the rush for marriage is about much more than the economic and legal benefits the union provides. Long before questions about legalizing same-sex marriages appeared before the courts, lesbians and gay men were seeking the blessing of religious communities for committed unions.

In recent months much talk has been spun among proponents of same-sex marriage about the legal and economic benefits that accompany state-sanctioned definitions of the family. Intriguingly, less has been said about the seemingly more obvious and long-enduring symbolic aspects of marriage. Yet, it is the symbolic, or cultural, meaning of marriage that is the central point of struggle for those opposed to same-sex unions. Lesbian and gay rights activists are correct in their focus on the discrimination that is inherent in state-sanctioned benefits that accrue through adherence to one and only one culturally accepted definition of family. We miss the mark however when we assume that U.S. legal and economic policy is grounded solely in rational arguments based on the discourse of individual "rights."

The mistake often made in such debates is a conflation of "is" and "ought"—according to advocates of same-sex marriage, the U.S. government "ought" to protect individual citizens from unequal treatment. In reality, however, U.S. economic and legal policy has always reflected (and often protected) cultural hierarchies of inclusion and belonging.[7]

Thus, the two sides currently represented in the marriage debate are not arguing about the same thing. Anthropologically, marriage is one of the only uniformly recognized rites of passage and signs of cultural achievement and social inclusion in U.S. society. In its ideal form, the union is recognized by the state and blessed by a church, symbolizing its deeply rooted cultural significance and legitimacy. Opponents of same-sex marriage are scrambling to conserve/preserve this symbolic institution of inclusion and belonging precisely because there are so few symbolic achievements that cut across the many cultural divides the define the landscape of U.S. society.[8] Proponents of same-sex marriage are arguing for governmentally recognized access to the economic and legal benefits that accompany marriage without (appearing to be) paying genuine homage to the cultural institution itself.

The preponderance of marriage = rights/benefits rhetoric can be interpreted as an expression of the lack of consensual solidarity among lesbians and gay men regarding cultural assimilation and normalcy. Queers who have never given much thought to the cultural institution of marriage, precisely because it doesn't seem to apply to us, now feel compelled to fight for the rights of same-sex couples to marry, but are only willing to do so within a framework of "equal access to benefits" logic. At the same time, many lesbian and gay couples are seeking not only the related economic benefits of marriage, but the full cultural package. And why wouldn't they? Culturally, we are saturated with notion that marriage is truly the pinnacle of inter-relational attainment (the "happiest moment of your life")Given similar acculturation, it stands to reason that many lesbians and gay men would grow up desiring the same cultural rites of belonging. If for the sake

of argument we assume that lesbians and gays want to win the battle for same-sex marriage, then the problem, from a political/rhetorical perspective, is not whether lesbians and gays should seek this form of cultural belonging, but the failure of same-sex marriage proponents to fully acknowledge the cultural significance of marriage and the desire of some queers to participate in it.

My interpretation is that lesbian and gay activists have been slow to engage in this line of defense ("we really do want to belong as fully as we possibly can") precisely because it requires articulating a desire for normalcy that many lesbians and gay men are loathe to acknowledge. Many of the activists at the front line of this debate are ambivalent about the level of cultural normalcy they want for themselves. Many are long-time critical feminists who have been key voices in deconstructing the normative family.[9]   At the same time, as cultural acceptance and belonging has increased for these individuals, largely oriented around economic, professional, and family achievements, they find themselves enjoying more and more of the cultural benefits of inclusion and belonging. It makes sense that they would want the full recognition (legal and even religious acknowledgement) that completes this cultural package. Is this radical? Will it revolutionize, or even reform, current cultural hierarchies of belonging? That's another question entirely.

A comparison with recent social movements in lesbian and gay participation in mainstream religions is instructive in terms of both political/rhetorical frames and the question of assimilation. For more than a decade lesbians and gay Christians have actively sought recognition as "out queers" within their religious congregations.   Self-described Christian queers often experience struggle and contradiction not only in their religious community, but among fellow lesbians and gay men.   In mainstream Christianity, homosexual behavior is typically defined as an irredeemable sin. At the same time, many queers question why someone would want to participate in an institution that, by definition, excludes

lesbians and gays from full acceptance. In contrast to the battle for same-sex marriage whereby many lesbians and gays are pitted against heterosexual Christians, the "open and affirming" movement in Christian congregations has included heterosexual and homosexual church members fighting side by side. This battle has sometimes been waged between congregants, some fighting for inclusion, others for exclusion. More recently however, the news making battles are between congregations (predominantly heterosexual) who are locked in doctrinal debates with institutional (denominational) leaders regarding lesbian and gay affirming practices such as ordination, taking of sacraments and performing commitment ceremonies at the congregational level. There is literally a social movement taking shape within the pews. In this instance, queers and straight allies are struggling side by side to stretch the Christian definitions of god and love to larger, more inclusive dimensions.[10]

In terms of political rhetorical frameworks, its worth noting that in the case of queer religiosity, both sides fully acknowledge the significance of the cultural institution—Christianity—and its meaning in their lives. Although it would be possible to do so, no one has made the claim that religious belonging conveys particular social benefits from which lesbians and gays should not be excluded. The battle is entirely about the parameters of inclusion within a cultural institution that all agree is significant. Lesbians and gay men who participate in mainstream Christian religions experience a great deal of conflict and also grapple with hostility both from fellow Christians and fellow queers. Paradoxically, as fellow congregants get to know their lesbian and gay members and watch them in their struggle for acceptance, they often feel as if their own faith is strengthened. In this particular case the struggle for acceptance reaffirms and reinforces the cultural institution. As one Baptist parishioner phrases it, "to see them (lesbian and gay congregants) remain faithful while putting up with so much prejudice, well, you just have to believe that God is big enough to love us all."[11]

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It's noteworthy that many Christians do not see lesbian and gay religious participation as a threat, but rather as an affirmation of their own religiosity. Fellow worshippers view the motivation for participation among lesbians and gay men as indicative that the church is deeply valued. Why is it so difficult to make a similar case for marriage? Obviously, if lesbians and gays are clamoring to participate in an institution that has long been in decline as well as under critical attack (e.g., divorce rates, media mockery, high rates of co-habitation, scholarly deconstruction) then it must be meaningful. Or so one would think.

Here again the tension between assimilationist and radical positions provides a basis for interpretation. Non-religious lesbians and gay men are deeply suspicious and often overtly hostile regarding religion. There have been no lesbian and gay task force initiatives fighting for the "right to equal worship." In fact, secular lesbian and gay activist groups have largely ignored queer Christianity. When there has been comment, it has often been in the form of questioning what are perceived to be the assimilationist motivations of queer Christians. Ironically, queer Christians seem both more aware of and articulate about the full reasons for their desire to participate in religious groups than do many secular lesbians and gays who are seeking marriage. Queer Christians know that their battleground is the sacred terrain of cultural significance and meaning and its power to convey a sense of belonging. They know that their quest for prideful acceptance within Christianity is fraught with contradictions. Is the quest for acceptance in Christianity radical? Assimilationist?

This line of inquiry constitutes a sort of truth trap wherein the answer can only be: it's both. The fact is, if nothing else, these struggles compel individuals to become engaged in reflection and discussion about the meaning of otherwise taken-for-granted cultural institutions. Why, really, are we so propelled toward marriage in this culture? Ultimately, successful struggles expand the range of choices for marginalized individuals who have been denied the opportunity to fully author their own lives, either

through narrowly inscribed stereotypes perpetuated through cultural hierarchies ("the sexually deviant cannot have normal family relations as defined by culture and law") or through tyrannies of solidarity ("how can you be a good queer and also want to be religious/married?"). In this regard, successful battles for inclusion stretch the boundaries of cultural institutions and simultaneously reinforce/strengthen their cultural significance. Given this, it is imperative never to lose sight of the question: successful for whom, and on what terms?

CONSIDERATIONS AND COMPLICATIONS

Legal and political recognition of same-sex unions is probably inevitable in the near future.[12] Whether it be in the form of civil unions or the full recognition of legal marriage as currently defined, this struggle will expand the repertoire for many lesbians and gay men regarding the freedom to choose "normalcy" if they so desire. At the same time, the institution itself, which stands as a citadel of normalcy, will have its walls of inclusion stretched while simultaneously strengthening and polishing its standing as the ultimate icon of cultural belonging. In this regard, the recognition of same-sex couples will be both radical and assimilationist.

At the same time, I don't expect that this expansion will change anything at all for single parents who are poor, or for extended families with dependent relatives who do not qualify for healthcare and related benefits under current guidelines for "dependency." Same-sex unions will not alter the current political/economic arrangement whereby an average individual has access to healthcare only through corporate employment or its equivalent for one or more family members recognized as such through the legal definition of marriage/family. Most middle-class and working poor citizens will still bear a disproportionate tax burden relative to benefits received. Should so many economic and legal benefits be connected, uncritically, to the cultural institution of marriage? Certainlynot. As Kramer argues in this issue, and as [13] Polikoff[14] and Fineman[15] have argued

convincingly, welfare states (of which the United States is one) should define and convey benefits and assurances based on realistic estimations of dependency.[16]   To this end, Kramer, Polikoff and Fineman call for a complete redefinition of the family as a basis for assessing economic households.

I appreciate these more complicated analyses and add that the question of the same-sex marriage, particularly as it is sometimes framed in terms of the implications of "seeking normal" needs to be problematized more complexly still on at least two dimensions: we should seek more comprehensive/comprehending analyses of the *significance* of cultural institutions in shaping lives and in reinforcing cultural hierarchies that are a basis for resource allocation; and we should interrogate the methodological and rhetorical practices by which implications regarding "radical" and "assimilationist" are falsely dichotomized. I conclude with a brief discussion of each of these points.

1) We need to pay more attention to the meaning and significance inscribed in particular cultural institutions, in this case, the institution of marriage. Whether one agrees with this meaning, it is empirically unsound and politically foolish to ignore cultural significance. Feminists scholars, myself included, have been deconstructing the institution of marriage for decades; successfully demonstrating the tremendous social and economic burden this small unit (the "couple") carries in corporate capitalist economy[17] as well as it's tremendous "compulsory" grip on our sense of self and accomplishment.[18] Despite these insights, we have not done the best job at achieving an additional feminist methodological creed, comprehending the "field of relations" on its own terms. Clearly marriage stands for more than 1,138 federal benefits. We do ourselves and our work an injustice when we fail to explore the very complex, and often contradictory, reasons for the tenacity of marriage in its current cultural form.

Likewise, lesbians and gay men (and all heterosexuals for that matter) should reflect more critically on the reasons for wanting marriage. A desire for cultural acceptance and belonging is understandable, but we do ourselves an injustice when we fail to fully explore the meaning and implications of participation in any highly significant cultural institution. To the extent that marriage is seen as a pinnacle of cultural achievement and a marker of acceptance, same-sex marriages will do nothing to alter this equation except in allowing for the possibility that the two-person unit (who is now responsible for most social and economic welfare of the "family") can be a same-sex unit. Certainly, in a gender-role obsessed society such as this, same-sex marital units will be radical. But in terms of more general cultural equations connected to hierarchies of belonging and used to determine who gets what, we shouldn't fool ourselves into believing that same-sex unions will pose much of a challenge to the existing status quo.

2) We also need more complicated discourses about who seeks belonging and what that reflects and, in turn, what consequences it carries in terms of change to cultural institutions. We need classed/gendered/raced analyses of who is seeking belonging in so-called "normalizing" institutions. We need nuanced, complex studies of variations among these groups (e.g., gay Christians) before any conclusions can be drawn about what is and isn't radical. One noteworthy consequence of the debate over the *right* to marry for lesbians and gays is that it cuts across other cultural fault lines. The resulting shifts are causing some interesting shake-ups and creating some bridges across long entrenched fissures of difference. For instance, many traditionally conservative parents of lesbian and gay men find themselves speaking out in favor of same-sex marriage. They imagine the cultural acceptance it will convey on their otherwise ostracized child and end up breaking stride with long-established political, religious and cultural allies. Even the *Economist,* the top-buttoned British news weekly, covered the story complete with glossy front picture. It's stance? "What's all the fuss about?" From the libertarian perspective, which the magazine espouses,

this position makes perfect sense. It doesn't sit so well, of course, with cultural conservatives who consider themselves economic libertarians. But is has been a reminder to many fence-sitting Republicans that it is possible for them to be more libertarian in their political views than they are conservative in their cultural commitments.

And my own stance? Some will find it contradictory, but that's often a consequence of the critical feminist inquiries I attempt to practice. Just as I understand why someone could find meaning and a sense of belonging as a queer practicing Christianity, I understand the considerable cultural draw of marriage.   I believe Heather and Barb Rhoads-Weaver (in this issue) when they write that their Canadian marriage had a discernible effect on how they felt about one another and their relationship.[19]   I comprehend the significance of this cultural institution to spin a binding web of commitment to one another and to convey a deeper sense of belonging in society generally. However, this is not the form of inclusion I seek. While I understand the desire of many lesbians and gay men to have their unions recognized by state and religion, I prefer the recognition, acceptance, respect and love granted me by my (Mormon) family, my colleagues, students and friends. Personally, I have never been compelled by the marital bug. But I would be disappointed if my family did not understand the need to support same-sex marriage legislation as it has been currently framed— i.e., one is either pro or anti-gay human rights.   In this aspect I am appreciative of Gary Chamberlain's theologically based advocacy he presents in this issue.[20]   I support the fight for everyone to make choices regarding how they wish to author their own lives and the meaning they seek for themselves and those they wish to define as "family." Simultaneously, I work to educate others about the fundamental need to forge a strong disconnect between culturally accepted definitions of "family" and political economic assessments of the distribution of benefits and assurances for U.S. citizens. In contemporary U.S. society, the power to define difference and the power to define economic well-being rest too

strongly in the same "family." The dismantling of this particular union is long overdue.

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[1] JUNE JORDAN, TECHNICAL DIFFICULTIES 197 (1994).

[2] Paula Ettlebrick & Julie Shapiro, *Are We on the Path to Liberation Now?: Same-Sex Marriage at Home and Abroad,* 2 SEATTLE J. SOC. JUST. 475 (2004).

[3] Amy Gluckman & Betsy Reed, *Lost in the Gay Marketing Moment: Leaving Diversity in the Dust*, DOLLARS & SENSE (Nov./Dec. 1993).

[4] *See e.g.,* John Gallagher, *Ikea's Gay Gamble*, ADVOCATE, May 3,1994; see also SUZANNA WALTERS, ALL THE RAGE: THE STORY OF GAY VISIBILITY IN AMERICA (2003) for a more recent summary description and analysis.

[5] Many of these critiques also note the absence of sexuality or sexual affection in many mainstream portrayals. Presumably, one price of acceptance is the continued "closeting" of the main dimension of difference, sexual behavior.

[6] Materials prepared by the *Lambda Legal Defense and Education Fund* use information from a list based on a 1997 response from the *General Accounting Office* to a request by Representative Henry J Hyde. Hyde was chairperson of the House *Committee on the Judiciary,* and asked the *General Accounting Office* "to identify federal laws in which benefits, rights and privileges are contingent on marital status." The *GAO* response lists 1,049 benefits. *available at*:
http://www.gao.gov/archive/1997/og97016.pdf. Lambda Legal Defense recently revised the list to 1,138 (2004).

[7] *Cf.* JANET R. JACOBSEN & ANN PELLEGRINI, LOVE THE SIN: SEXUAL REGULATION AND THE LIMITS OF RELIGIOUS TOLERANCE (2003).

[8] Another primary cultural function of marriage in U.S. society is a "performance" of appropriate gender roles. Sexual preference more generally can be seen as one among many forms of behavior through which the individual performs her or his gender. Same-sex marriages muddy this otherwise clear cultural script. Some scholars have proposed that much of the resistance to same-sex partnerships can be attributed to the (semi-conscious) drive to maintain traditional gender lines. Appropriate gender performance, which culminates in marriage, is indicative of full cultural comprehension and belonging.

[9] *See, e.g.,* Julie Shapiro, *A Lesbian-Centered Critique of Second-Parent Adoptions*, 14 BERKELEY WOMEN'S L. J. 17 (1999).

[10] Jodi O'Brien, *Wrestling the Angel of Contradiction: Queer Christian Identities*, 5 CULTURE & RELIGION 179 (forthcoming July 2004).

[11] This quote is taken from an interview I conducted while researching a project on religion and homosexuality from 2000–02. Consistent with ethnographic convention, this interview was taped and transcribed and is on file with the author. See O'Brien, *supra* note 10 for methodological details.

[12] As I write this, the United States Supreme Court has just declined to intervene in the State of Massachussetts' recognition of gay marriages (decision rendered May 13, 2004). *See* J.M. Lawrence, *Same-Sex Marriage; "Hail Mary" Appeal Denied; Supreme Court rejects bid to halt weddings*, BOSTON HERALD, May 15, 2004, at 5.

[13] Zak Kramer, *Exclusionary Equality and the Case for Same-Sex Families: A Reworking of Martha Fineman's Re-visioned Family Law*, 2 SEATTLE J. SOC. JUST. 505 (2004).

[14] Nancy D. Polikoff, *Why Lesbians and Gay Men should Read Martha Fineman*, 8 AM. U. J. GENDER SOC. POL'Y & L. 167 (2000).

[15] MARTHA FINEMAN, THE NEUTERED MOTHER: THE SEXUAL FAMILY AND OTHER TWENTIETH CENTURY TRAGEDIES (1995).

[16] For a comparative analysis of welfare state policy and family definitions, see MANUELA NALDINI, THE FAMILY IN THE MEDITERRANEAN WELFARE STATES (2003).

[17] Many critics of same-sex marriage recognize that increasing corporatization and decreasing collective/community ties are placing an unrealistic burden on the individual family unit (e.g., responsibilities for economic welfare, nurturance, companionship, cultural reproduction of values and knowledge, etc.). For a complete analysis, see Jodi O'Brien, *Family Equations: Whose Family? Whose Values?*, *in* SOCIAL PRISMS: REFLECTIONS ON EVERYDAY MYTHS AND PARADOXES 162–93 (1999).

[18] Adrienne Rich, *Compulsory Heterosexuality and Lesbian Experience*, 5 SIGNS: JOURNAL OF WOMEN IN CULTURE AND SOCIETY 631–60 (1980).

[19] Barbara Rhoads Weaver & Heather Rhoads-Weaver, *In the Pursuit of Happiness: One Lesbian Couple's Personal Thoughts on Marriage*, 2 SEATTLE J. SOC. JUST. 539 (2004).

[20] Gary Chamberlain, *A Religious Argument for Same-Sex Marriage*, 2 SEATTLE J. SOC. JUST. 495 (2004).