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Since the late 1990s a series of court decisions has raised the possibility that the civil right to marriage might soon be accorded to all citizens, not just to heterosexuals. Most significantly, in 2003 the Massachusetts Supreme Court ruled that denying same-sex couples access to civil marriage violates the state's constitution, which "forbids the creation of "second class citizens," and on May 17, 2004, Massachusetts began issuing marriage licenses to same-sex couples who reside in the state. In direct opposition to legal equality for lesbian and gay couples, conservative forces have mobilized across the country in "defense" of heterosexual-only marriage. The Massachusetts decision fuelled calls for the passage of the Federal Marriage Amendment, originally introduced in 2001, which states "Marriage in the United States shall consist only of the union of a man and a woman. Neither this Constitution, nor the constitution of any State, shall be construed to require that marriage or the legal incidents thereof be conferred upon any union other than the union of a man and a woman." The Amendment would make permanent the 1996 Defense of Marriage Act (DOMA)—"no State shall be required to give effect to a law of any other State with respect to a same-sex 'marriage'"— which might be found to violate the Constitution's "full faith and credit clause." Even without the Amendment, however, DOMA prohibits the extension of federal benefits to legally married same-sex couples, thus denying those married in Massachusetts full equality before the law.

In their attempt to prevent the logical extension of liberal principles to lesbian and gay citizens, anti-homosexual activists have made common cause with a number of other reactionary movements that want to undo the progress of feminism and reestablish the patriarchal nuclear family as the dominant family form. This essay examines the interconnected arguments advanced by a number of conservative constituencies committed to the politics of neo-patriarchy, including the religious particularism of the Christian Right, the homophobic anti-feminism of Concerned Women for America, the "family values" of James Dobson, the Fatherhood movement spearheaded by David Blankenhorn, and the conservative democratic theory of William Galston. While the details of these arguments differ, all have a similar form and use the same authorities, and all are both homophobic and anti-feminist. Thus, all undermine the principles of liberal democracy, despite rhetorical assertions to the contrary.

Lesbian / Gay Civil Rights and the Logic of Liberalism

Legal equality constitutes one of the most important founding principles of liberal democracy in the United States. While the equal rights of the Declaration of Independence were largely aspirational at the time they were written, over the course of the twentieth century, American society has become increasingly imbued with a liberal public philosophy that values individual choice, civil rights, legal equality, and a "neutral state" that leaves individuals free to pursue their own vision of the good life in civil society and the private sphere without interference from the government.

The revolutionary principle of legal equality has been successfully used to justify progressive change. African-Americans utilized this principle during the Civil Rights Movement in their struggle to end segregation. While violently opposed by the Right at the time, the principle of color-blind law has been largely accepted by contemporary conservatives. The struggle for gender-blind law has also been largely successful. Although feminists lost the battle for the Equal Rights Amendment (ERA) during the 1970s, since that time the principle of legal equality for women has been implemented through the Courts, which are charged with following the logic of liberalism as they apply the principles of the Constitution to new areas. While progress has not been inevitable or

without setbacks, overall the level of legal equality within American society has advanced over time.

Despite the compelling logic of philosophical liberalism, the American Right actively opposed the extension of legal equality in every instance. The Old Right was explicitly racist and violently fought to stop the extension of civil rights to African-Americans. By 1965, however, Gallup polls "showed that 52 percent of Americans identified civil rights as the 'most important problem' confronting the nation, and an astonishing 75 percent of respondents favored federal voting rights legislation." With explicit racism on the decline, in 1965 right-wing leaders began developing a more marketable message, "main-streaming the ideological positions of the Old Right and developing winnable policies" that "highlighted a protest theme" against a wide range of cultural changes inaugurated by the new social movements of the 1960s. This "New Right" successfully created a coalition between cultural conservatives, including Christian fundamentalists, and anti-government, fiscal conservatives (*aka* neo-liberals).

Feminism constituted precisely the enemy the New Right needed to consolidate its base. Anti-feminism "provided a link with fundamentalist churches," focused "the reaction against the changes in child rearing, sexual behavior, divorce, and the use of drugs that had taken place in the 1960s and 1970s," and "mobilized a group, traditional homemakers, that had lost status over the two previous decades and was feeling the psychological effects of the loss." The conservative mobilization against feminism solidified the New Right during the 1970s and played a "very important" role in its success: the election of Ronald Reagan in 1980 and the rightward shift of American politics.

The women's movement and the lesbian/gay civil rights movement were linked theoretically and through common struggle, and the Right used this connection to its advantage. For example, Phyllis Schlafly's Eagle Forum argued that "militant homosexuals from all over America have made the ERA issue a hot priority. Why? To be able finally to get homosexual marriage licenses, to adopt children and raise them to emulate their homosexual 'parents,' and to obtain pension and medical benefits for odd-couple 'spouses.'... Vote *NO on 6!* The Pro-Gay E.R.A." In its rise to power, the New Right successfully manipulated homophobia to increase opposition to gender equality and explicitly condemned all attempts to accord lesbians and gay men the equal protection of the law.

While the Christian Right continues to pose a serious threat to civil rights and has achieved unprecedented levels of power since 1980, the logic of liberalism in American society is hard to deny. While public opinion polls vary, support for same-sex marriage is particularly strong among young people who have come to age during an era of nearly hegemonic liberalism. A UCLA survey of first-year college students revealed that 58 percent of first year college students now "think gay and lesbian couples should have the right to 'equal marital status,' i.e., civil marriage." Remarkably, of that 58 percent, half consider themselves conservative or "middle-of-the-road" in their political views. A poll of first year students at Ithaca College shows that "79 percent of Ithaca College freshmen agreed that same-sex marriage should be legal, compared to 59.3 percent nationwide." In the New Jersey poll an overwhelming 71 percent of those between 18 and 29 support the legalization of same-sex marriage, and in the New Hampshire poll, 70 percent of 17 to 29 year olds do. While the media widely publicized a Gallup poll conducted after the *Lawrence v. Texas* ruling striking down anti-homosexual sodomy laws that revealed some decline in support for same-sex unions, the decline was not evident among the young (18-29), 61 percent of whom "say they support legalizing same-sex 'marriage.'" Nevertheless, a coalition of religious, secular, and academic activists and organizations continue to oppose, and organize around their opposition to, the rights of gays and lesbians to marry or form civil unions.

Religious Particularism and the Anti-Homosexual Agenda

The Christian Right opposes legal equality for lesbians and gay men when it comes to marriage because it defines marriage as a sacred religious institution, and its particular version of Christianity views homosexuality as a particularly grave sin. According to the Family Research Council (FRC) marriage is "*the work of heaven and every major religion* and culture throughout

world history." Concerned Women for America (CWA) proclaims "we believe that marriage is a *covenant established by God* wherein one man and one woman, united for life, are licensed by the state for the purpose of founding and maintaining a family." Focus on the Family (FOF) opposes even "civil unions" because they "would essentially legalize homosexual marriage and therefore undermine the *sanctity* of marriage." Indeed because of this religious worldview, all three groups have made opposition to same-sex marriage a centerpiece of their political agenda.

The Christian Right's vision of heterosexual marriage directly relates to its understanding of gender differences, which it bases on its particular interpretation of the Christian Bible. More specifically, this reading focuses on the second creation story in Genesis, in which God created Eve out of Adam's rib to be his helper and declared that the man and his wife would become "one flesh" (Genesis 18: 21-24), rather than on the first story in which "God created man in His image, in the image of God He created him; *male and female He created them*" (Genesis 1:26-27, emphasis added). Additionally, instead of reading the latter version as establishing gender equality at the origin, or even androgyny, as some religious scholars do, the Christian Right interprets it to mean "God's purpose for man was that there should be two sexes, male and female. Every person is either a 'he' or a 'she.' God did not divide mankind into three or four or five sexes." The Christian Right bolsters its interpretation with a few New Testament verses stating that woman is the "weaker vessel" (1 Peter 3:7), that man is "joined to his wife, and the two become one flesh" (Eph. 5:31-32), and that the "husband is the head of the wife" (1 Cor. 11:4; Eph. 5:23).

For the Christian Right, the Bible not only proclaims a natural gender hierarchy but also condemns homosexuality as a sin. It bases its interpretation on two sentences in Leviticus that proclaim "do not lie with a male as one lies with a woman; it is an abhorrence" (Leviticus 18:22) and "if a man lies with a male as one lies with a woman, the two of them have done an abhorrent thing; they shall be put to death" (Leviticus 20:13), completely ignoring the fact that the Ten Commandments did not include a prohibition on homosexuality. The Christian Right also stresses an interpretation of the Sodom and Gomorrah story (Genesis 18:16-19:29) that depicts the city's destruction as God's punishment for homosexuality, an interpretation that is highly contested by religious scholars. Finally, right-wing Christians justify their condemnation of lesbian and gay sexuality on three passages in Paul's writings—two words and two sentences total (I Corinthians 6:9-10, I Timothy 1:8-10, and Romans 1:26-27). They cannot base it on what Jesus said because he never even mentioned homosexuality. Although the meanings of all these passages have been debated at length by religious scholars, and no consensus exists as to their meanings, nevertheless, conservative Christians insist that God's will is as clear as it is specific: man and woman are naturally different, designed by God for heterosexual marriage and the establishment of the patriarchal family.

As far as their own religious rites are concerned, Christian Right churches certainly have the religious liberty to define marriage any way they see fit. However, when the faithful of the Christian Right ask the U.S. government and the governments of the states to restrict the right to civil marriage because of their particular interpretation of revealed religion, they violate the separation of church and state mandated by the First Amendment. Not all religions share the Christian Right's definition of marriage. For example, Reform Judaism not only favors civil marriage for gays and lesbians but also allows for religious unions, and many Muslims practice polygamy. In fact, even within Christianity, no clear consensus exists on the question of same-sex marriage. Nevertheless, despite the diversity of beliefs within America's religiously pluralistic society, the Christian Right group Alliance for Marriage has introduced a Federal Marriage Amendment that declares "Marriage in the United States shall consist only of the union of a man and a woman." Clearly this Amendment asks the federal government to establish one particular religious definition of marriage as the law of the land, thus violating the separation of church and state.

That '70s Argument: The Anxiety of Right-Wing Women

The Christian Right group Concerned Women for America, which claims to be the largest women's group in the country, consistently asserts that the struggle of lesbians and gay men for

the right to marry is not an attempt to participate in the institution of marriage but rather an attempt to "undermine marriage" and destroy the family. In strictly logical terms this makes no sense. Aren't lesbians and gays actually *reinforcing* the legitimacy of marriage as an institution through their struggle for the right to marry? Indeed many within the LGBT community have criticized this struggle for doing precisely that and not much more. While same-sex marriage would not undermine the institution of marriage in general, it would undermine the *traditional patriarchal heterosexual vision of marriage* in particular, which is precisely what the Christian Right desperately wants to re-establish.

Concerned Women for America wants heterosexual marriage to maintain its privileged status in American society and to continue to function as the justification for special rights. This line of argumentation plays on a number of anxieties expressed by the first generation of New Right women who mobilized in opposition to the ERA and abortion rights during the 1970s. Status was a key concern for those women. "At the beginning of the contemporary women's movement, in 1968, women of all classes found themselves in something like the same boat." Most were homemakers and/or low-level employees. However, over the course of the next two decades "homemakers suffered a tremendous loss in social prestige" as "high-status women" began choosing careers over homemaking. Consequently, conservative homemakers—who, after all, had done the *right thing* for their time—now found themselves facing "status degradation," and they resented it. Twenty-five years later, the special status of heterosexual marriage is being threatened by lesbians and gays, and many right-wing women again feel diminished.

Opposed to government-sponsored family support, Christian Right women favor laws that force individual men to take responsibility for the children they father and for the mothers who bear those children. The 70s generation feared that the changes inaugurated by feminism—the ERA, reproductive freedom, no-fault divorce, and the loosening of sexual mores—would make it easier for men to get out of their familial commitments. As opposed to liberal feminist women who wanted the right to compete equally with men, many anti-feminist women did not have the educational level or job skills that would allow them to pursue satisfying careers if forced to work outside the home. They feared that the *ERA* would eliminate the traditional legal requirement for husbands to support their wives financially. Phyllis Schlafly told homemakers that the ERA would say "Boys, supporting your wives isn't your responsibility anymore." At the same time, the rise of "no-fault" divorce laws during this period further threatened the economic security of traditional "housewives." As Schlafly put it, "even though love may go out the window, the obligation should remain. ERA would eliminate that obligation." To this day, Christian Right women condemn no-fault divorce, which "allows one person to decide when a relationship can be severed," often catapulting women into poverty. While higher wages for women, safe and affordable childcare, and universal health insurance constitute a progressive solution to the problems caused by the fragility of marriage and callousness of deadbeat dads, right-wing women demand the return of a traditional patriarchal vision of marriage, ignoring the reality of social change.

In the 1970s, conservative women worried that if sex became widely available outside of marriage, they would have difficulty keeping their husbands interested in them. Kristen Luker's interviews with the first generation of "pro-life" women revealed the following insight:

If women plan to find their primary role in marriage and the family, then they face a need to create a "moral cartel" when it comes to sex.... If many women are willing to sleep with men outside of marriage, then the regular sexual activity that comes with marriage is much less valuable an incentive to marry.... [For] traditional women, their primary resource for marriage is the promise of a stable home, with everything it implies: children, regular sex, a "haven in a heartless world."

For the first generation of Christian Right women, the sexual liberation of many feminist women threatened to destabilize the marital bargain that many traditional women relied upon. Given the option, their husbands might abandon them for more exciting women.

Do today's Christian Right women fear that if given the choice their husbands might choose other men? Perhaps. After all, anti-gay activist Dr. Paul Cameron tells them that "the evidence is

that men do a better job on men, and women on women, if all you are looking for is orgasm." If you want "the most satisfying orgasm you can get," he explains, "then homosexuality seems too powerful to resist. . . . It's pure sexuality. It's almost like pure heroin. It's such a rush." In opposition, "marital sex tends toward the boring" and generally "doesn't deliver the kind of sheer sexual pleasure that homosexual sex does." Although the American Psychological Association expelled Cameron for ethics violations in 1983, he still serves as an oft-quoted right-wing "expert" on homosexuality. In light of his comments, it would be understandable if Christian Right women feel anxious about their ability to keep their husbands interested in heterosexual marriage.

Fundamentally different, men and women come together to reproduce and remain coupled in order to rear their children. Because homosexuality severs the connection between sex and reproduction, CWA sees homosexual relationships as necessarily fleeting, as driven by sexual gratification alone. For example, Beverly LaHaye insists that "homosexual relationships are not only the antithesis to family, but also threaten its very core. It is *the compulsive desire for sexual gratification without lasting commitment*, the high rate of promiscuity, and the self-defined morality among homosexuals that sap the vitality of the family structure, making it something less than it was, is, and should be." Clearly the desire of many gay and lesbian couples to marry and to raise children belies this argument. Nevertheless, Christian Right groups like CWA purposely depict the struggle for lesbian/gay civil rights in a reductive and patently distorted way in order to manipulate the anxieties of traditional women, secure their own special interests and advance their larger political agenda.

Neo-Patriarchy and the Fatherhood Movement

Joining the opposition to same-sex marriage are advocates of the fatherhood movement who seek to restore traditional gender roles and reestablish the patriarchal family as the dominant family form in America. Because no evidence exists that same-sex couples are less functional than heterosexual ones, or that their children are more likely to suffer negative effects, allowing same-sex couples to marry and have children would clearly undermine the myth that the patriarchal heterosexual family is the superior family form. Consequently, the fatherhood activists repeatedly assert that children need both a masculine father and a feminine mother in order to develop properly.

The fatherhood movement blames feminism and single mothers for the social problems caused by men and teenaged boys. While the packaging of their arguments varies slightly, advocates of this school of thought generally make a similar claim: Refusing to respect natural gender differences, feminists have pathologized masculinity and futilely attempted to change the behavior of men and boys. They have undermined the rightful authority of men as the head of the household, attempted to change the natural division of labor that exists between mothers and fathers, and propagated the idea that a woman can fulfill the role traditionally played by a man, thus rendering fathers superfluous to family life. Consequently, men have lost interest in fulfilling their traditional family responsibilities, and boys have no one to teach them how to become responsible men. Detached from the civilizing influence of the traditional patriarchal family, males increasingly cause a wide array of social problems, and everybody suffers.

Focus on the Family president James Dobson makes this argument from a Christian Right perspective. In *Bringing Up Boys*, he argues that traditional gender roles are natural and cannot be changed. He points to the continued power of men in society as evidence of their natural, "biochemical and anatomical," dominance. Dobson strongly opposes attempts to change the gender socialization of children and explicitly links this "unisexual" idea to "the powerful gay and lesbian agenda," whose propagandists are teaching a revolutionary view of sexuality called "gender feminism," which insists that sex assignment is irrelevant. While Dobson sees this as dangerous for both sexes, it is particularly harmful for boys: "Protect the masculinity of your boys, who will be under increasing political pressure in years to come."

Dobson believes that a breakdown of traditional gender roles within the family fosters homosexuality in children. The prevention of homosexuality among boys requires the involvement

of a properly masculine heterosexual father, especially during the early years. Dobson relies on the work of Dr. Joseph Nicolosi, a leading proponent of the Christian Right's "ex-gay" movement, who urges parents to monitor their children for signs of "prehomosexuality," so professionals can step in before it is too late. While "feminine behavior in boyhood" is clearly a sign, so is "nonmasculinity" defined as not fitting in with male peers. "The father," Nicolosi asserts, "plays an essential role in a boy's normal development as a man. The truth is, Dad is more important than Mom." In order to ensure heterosexuality, the father "needs to mirror and affirm his son's maleness. He can play rough-and-tumble games with his son, in ways that are decidedly different from the games he would play with a little girl. He can help his son learn to throw and catch a ball. ... He can even take his son with him into the shower, where the boy cannot help but notice that Dad has a penis, just like his, only bigger."

Based solely on the work of Nicolosi, Dobson concludes, "if you as a parent have an effeminate boy or a masculinized girl, I urge you to get a copy [of Nicolosi's book] and then seek immediate professional help." Beware, however, of "secular" mental health professionals who will most certainly "take the wrong approach—telling your child that he is homosexual and needs to accept that fact." Instead, Dobson recommends a referral from either Exodus International, the leading organization of the ex-gay ministries, or the National Association for Research and Therapy of Homosexuality, "formed to oppose the 1973 decision by the American Psychological Association to no longer classify homosexuality as an emotional or mental disorder."

Dobson's emphasis on the important role played by fathers bolsters the arguments of the "fatherhood movement," which emerged during the 1990s. One of the first organizations to spearhead this movement was the Promise Keepers (PK), founded by Bill McCartney in 1990 as a "Christ-centered ministry dedicated to uniting men through vital relationships to become godly influences in their world." This organization wants to restore fathers to their rightful place at the head of the patriarchal family.

Institute for American Values president David Blankenhorn advances a similar agenda using secular arguments. His book *Fatherless America* (1995) and the follow-up volume, *The Fatherhood Movement* (1999)—co-edited with Wade Horn (George W. Bush's Secretary of Health and Human Services) and Mitchell Pearlstein—blames the "declining child well-being in our society," not on growing levels of poverty, deteriorating public services, lack of safe and affordable childcare, the lower income of women, child abuse, racism or misogyny, but rather on fatherlessness. Fatherlessness, he tells us, is "the engine driving our most urgent social problems, from crime to adolescent pregnancy to child sexual abuse to domestic violence against women." While some conservatives argue that "the best anti-poverty program for children is a stable, intact family," Blankenhorn demands more: "a married father on the premises."

Like those on the Christian Right, Blankenhorn insists that children need not just two involved parents but more specifically *a male father and a female mother enacting traditional gender roles*. Citing two anthropologists, Blankenhorn claims that "gendered parental roles derive precisely from children's needs." During childhood "the needs of the child compel mothers and fathers to specialize in their labor and to adopt gender-based parental roles." Consequently, men and women should stick with traditional roles, Blankenhorn insists, even if this conflicts with their "narcissistic claims" to personal autonomy.

Like Dobson, Blankenhorn condemns attempts to equalize the roles of mothers and fathers in childrearing, and derides what he calls the new "like-a-mother father." While Blankenhorn barely mentions lesbians and gay men in his analysis, his argument clearly justifies an opposition to same-sex marriage. Obviously, his insistence that proper childhood development requires heterosexual parents who enact traditional gender roles implies that, in his view, homosexual couples cannot raise healthy children. In addition, however, Blankenhorn specifically advocates laws to prohibit unmarried women from accessing sperm banks. Perhaps he shares the fear of CWA that gender equality would mean that "lesbian women would be considered no different from men," especially once they get access to male seed. If that were to happen, where would that leave men?

"Seedbeds of Virtue": What Lessons Does the Patriarchal Family Teach?

Building directly on the body of literature outlined above, a growing number of right-wing activists, respectable scholars, and well-known political theorists have begun connecting the neo-patriarchal movement to the survival and revitalization of American democracy. This approach claims, in short, that liberal democracy requires virtuous citizens, and virtue is best learned at home in a traditional family with two married parents. The Institute for American Values sponsored a conference on this topic that resulted in the publication of *Seedbeds of Virtue: Sources of Competence, Character, and Citizenship in American Society* that Blankenhorn edited with Mary Ann Glendon who so strongly opposes same-sex unions that she helped draft both the Federal Marriage Amendment and a similar amendment to the Massachusetts constitution.

While many conservative thinkers support the "seedbeds of virtue" approach to justifying the patriarchal heterosexual family—many in exactly the same terms as the fatherhood movement—I will concentrate on the arguments advanced by political theorist William Galston, who served as Deputy Assistant to the President for Domestic Policy under Bill Clinton, a *Democratic* president. While Galston's defense of the family does not explicitly specify the patriarchal heterosexual family form in particular, one can only infer that he endorses that vision for several reasons. First, he makes arguments similar to those of the neo-patriarchalists *without any caveats*. Second, he explicitly praises Mary Ann Glendon and Jean Bethke Elshtain for having "already said nearly everything that needs saying on [the subject of the family]." While Glendon works politically in opposition to same-sex marriage, Elshtain's scholarship specifically proposes "a normative vision of the family—mothers, fathers, and children" and claims that this particular family form "is not only *not* at odds with democratic civil society but is in fact, now more than ever, a prerequisite for that society to function." Third, Galston himself signs *A Call to Civil Society: Why Democracy Needs Moral Truths* that says the number one priority for American democracy should be "to increase the likelihood that more children will grow up with their two married parents."

In addition, the lack of explicit references to homosexuality should not be interpreted as a lack of homophobia. As Jean Hardisty has discovered, since the mid-1980s, Christian Right organizations have tended to "highlight the religious principles undergirding their anti-homosexual politics only when they are targeting other Christians. When organizing in the wider political arena, they frame their anti-gay organizing as a struggle for secular ends, such as 'defense of the family.'" Thus you get James Dobson in Christian Right circles, David Blankenhorn in secular circles, and William Galston in academic circles. Despite variations on the theme, one thing remains constant: the normative vision presented by these conservatives gives lesbians and gay men absolutely no place in family life, and, by extension, no place in democratic society.

Working from a firm foundation in the history of political thought, Galston argues that liberal democracy requires individuals who have the virtues necessary for life in a free society. The claim is simple: "that the operation of liberal institutions is affected in important ways by the character of citizens (and leaders), and that at some point, the attenuation of individual virtue will create pathologies with which liberal political contrivances, however technically perfect their design, simply cannot cope." Cataloguing the wide array of virtues necessary for liberal democracy, Galston only implies that the traditional family best teaches these virtues to youngsters; he never argues it explicitly.

An examination of how the particular virtues cited by Galston relate to the traditional family produces three different arguments. First, many of the virtues Galston emphasizes, while originally acquired in a family, do not require a patriarchal heterosexual family form in particular. For example, important virtues like civility, the work ethic, delayed gratification, adaptability, discernment, and "the ability to work within constraints on action imposed by social diversity and constitutional institutions" could certainly be instilled in children by any functional family, including one headed by same-sex parents. Galston makes no argument for the superiority of heterosexuals in fostering these characteristics in children, and such an argument is not supported by empirical evidence.

Second, the traditional patriarchal family could actually undermine a number of important virtues extolled by Galston. For example, he argues that a liberal society is characterized by two key features—individualism and diversity. While children certainly need to learn independence, how does the traditional patriarchal family, in which wives are dependent upon their husbands' leadership and economic support, teach the virtue of independence to future *female* citizens? Galston must be focusing on boys only. Additionally, Galston cites "loyalty" as a central virtue for liberal democracy, defining it as "the developed capacity to understand, to accept, and to act on the core principles of one's society." This "is particularly important in liberal communities," he argues, because they "tend to be organized around abstract principles rather than shared ethnicity, nationality, or history." But if one of the fundamental principles of liberal democracy is legal equality for all citizens, again we must ask: What lessons does a child learn about equality growing up in a patriarchal nuclear family in which *men lead and women submit*? While the traditional family may provide certain benefits to children, it is unclear how it teaches them the universal principle of equality for all citizens, when this family form models gender inequality.

Third, a number of the democratic virtues Galston emphasizes could be undermined by the normative vision of the Christian Right. For example, Galston emphasizes "the willingness to *listen seriously to a range of views*" and the "willingness to set forth one's own views intelligibly and candidly as the basis of a *politics of persuasion rather than manipulation or coercion*." This directly relates to the virtue of *tolerance*. While Galston stresses that tolerance does not mean a belief that all lifestyles are "equally good," it does mean that "the pursuit of the better course should be (and in some cases can only be) the consequence of *education or persuasion rather than coercion*." While open-mindedness, tolerance, and non-coercion certainly constitute important virtues for any democratic society, they are not hallmarks of the Christian Right, especially when it comes to its anti-homosexual agenda.

Conclusion

The fight against the extension of civil rights to lesbians and gay men forms a central component of the larger battle against women's equality. While the rhetoric deployed by conservatives resonates with many of our most cherished cultural narratives and personal fantasies, their overarching agenda actually undermines our most precious political values, including the separation of church and state, legal equality and personal liberty. While liberal democracy has its limitations, its virtue is that it maximizes the freedom of all by allowing individuals to organize their personal lives as they see fit. While a liberal state may respond to the will of its citizens by providing a default set of legal entanglements that make it easier for individuals to establish families (i.e., civil marriage), it may not legitimately deny equal protection of the laws to particular groups of citizens, no matter how unpopular they are. The conservative arguments against same-sex marriage, whether religious, secular, or academic, are all similarly structured and based on an idealized, inegalitarian heterosexual family with rigid gender roles. Justified by references to the well-being of children, these arguments are unsustainable when subjected to close scrutiny.