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HOW CAN ALLIES EFFECTIVELY ADVOCATE FOR GAY RIGHTS? THE ANSWER IS STRAIGHTFORWARD

Scott Benson†


I. INTRODUCTION

For advocates of equality for gay, lesbian, bisexual and transgender (“GLBT”) people, the daily news is both encouraging and disconcerting. While advances in the struggle for equality have been made—advances that just ten years ago would have seemed inconceivable—backlash against these advances threatens to undo many of the hard-fought gains won for equality. Enter Ian Ayres and Jennifer Gerarda Brown and their book Straightforward, a “how to” guide for mobilizing heterosexual support for gay rights. Born out of a conversation with a gay friend at Ayres’ and Brown’s 1993 wedding reception, Straightforward sets forth strategies that might be used to end discrimination against GLBT people in a variety of circumstances, from employment, to marriage, to military service, and more. In this regard, the book clearly hits its mark. Straightforward is both practical and inspired. While some of the more provocative ideas in the book, such as “How to Bring Up Your Kid Bisexual” in which the authors explore the idea that parents might try to promote a bisexual orientation in their children, threaten to alienate readers, the vast majority of the ideas advanced

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1. IAN AYRES & JENNIFER GERARDA BROWN, STRAIGHTFORWARD: HOW TO MOBILIZE HETEROSEXUAL SUPPORT FOR GAY RIGHTS (2005).
2. Id.
3. Id. at ix.
4. Id. at 30-37.
by the authors are so sensible, cogent, and well-considered that they make the few minor transgressions easy to overlook. The book is aptly named. Its advice concerning how to advocate for equality is indeed straightforward.

The essential premise advanced by Ayres and Brown is that every GLBT person should be able to enlist the help of at least two heterosexual friends, family members, or coworkers to actively support the GLBT struggle for equality as allies.\(^5\) Once enlisted, what can those allies do? \textit{Straightforward} provides strategies for members of the GLBT community and their allies to support the GLBT movement as part of their personal lives as well as through their economic and political activities.\(^6\) The book begins by naming a potential obstacle and resource for heterosexual allies in joining the fight for gay rights: heterosexual privilege defined as “the range of perks and incentives with which heterosexually identified persons are rewarded for conforming to the dominant sexuality.”\(^7\) One obstacle of enlisting heterosexual allies in the fight for equality is that even well-meaning heterosexual people may be blind to the privileges they enjoy and consequently do not see how a lack of privilege disadvantages GLBT people.\(^8\) The book proposes three strategies for managing this privilege: “exercising it, disabling it, and renouncing it.”\(^9\) Exercising privilege might include using independent “buying power” to economically reward states that advance gay rights by, for instance, choosing to vacation in those states.\(^10\) Disabling privilege might include “ambiguating” sexuality, or a willingness to be “mistaken” as gay in order to advance gay rights.\(^11\) While the book does not argue that GLBT people need to be hidden, it does explore when straight allies might ambiguate their sexuality in order to advance gay rights. Finally, the third strategy, renouncing privilege, includes “explicitly separating oneself from an institution that ordinarily grants or enhances heterosexual privilege.”\(^12\)

\begin{itemize}
  \item \(^5\). \textit{Id.} at 2.
  \item \(^6\). \textit{Id.}
  \item \(^7\). \textit{Id.} at 7 (citing Bruce Ryder, \textit{Straight Talk: Male Heterosexual Privilege}, 16 QUEENS L.J. 287, 290 (1991)).
  \item \(^8\). \textit{Id.} at 3.
  \item \(^9\). \textit{Id.} at 4.
  \item \(^10\). \textit{Id.} at 5.
  \item \(^11\). \textit{Id.} at 7; \textit{see discussion infra} Part III and note 50.
  \item \(^12\). \textit{AYERS & GERARDA, supra} note 1, at 10; \textit{see discussion infra} Part IV.
\end{itemize}
II. EXERCISING PRIVILEGE

While many have focused on the GLBT market as a source of economic power to promote change for equality, *Straightforward* succinctly describes strategies for deploying both political and purchasing power of allies to promote gay rights. To begin, however, the book explores how privilege is invisible to its holders and examines when it is better to exercise privilege rather than renounce it or ambiguously one’s sexuality. After all, if heterosexuals benefit from privileges denied to GLBT people, is it not morally superior for heterosexuals to renounce those privileges by remaining unmarried, staying out of the military, boycotting discriminatory private organizations (such as the Boy Scouts of America), forgoing any behavior in public that would identify one as heterosexual, and refraining from public references to significant others? The authors recognize that, while renunciation of heterosexual privilege might be an effective strategy at times, it is not practical or even the most effective means of dealing with discrimination in many cases. This strategy asks too much and, by doing so, encourages allies actually to forego opportunities to use their privileged status to bring about change. Instead, *Straightforward* recommends the pragmatic, incremental approach that openly gay U.S. Congressman Barney Frank advocates. This approach seeks to gain small footholds by which the larger goal of equality can be achieved. Pragmatic incrementalism does not endorse allies’ unthinkingly continuing to exercise privilege in all circumstances, but it challenges allies to consider when it is more effective to exploit privilege to advance gay rights and when it is better to challenge privilege by renouncing it.

If allies determine it is best to exercise their privilege, where might they do so? *Straightforward* suggests several areas. In Chapter Two, the book explores the ability of allies to champion equality in the arenas of parenting, schools, churches, and employment. The portion of the book devoted to techniques for parenting are

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14. *Id. at 20.*
15. *Id.*
18. *Id. at 22.*
perhaps the most controversial. The authors examine the thoughts of Eve Kosofsky Sedgwick in her essay, *How to Bring Up Your Kid Gay,* and suggest parents consider “How to Bring Up Your Kid Bisexual.” The authors acknowledge that the approach faces difficulty for three reasons: (1) even parents who have positive views of homosexuality unconsciously work to suppress it in their children because they generally aspire for children to resemble their parents; (2) even progressive parents might wish to suppress homosexuality in their children because they want to protect them from hostility and discrimination; and (3) parents do not generally think about their children as having a sexuality. To make their point, the authors rely on two analogies to support their position that parents should leave open the possibility that their child could be gay, reinforcing the legitimacy of different ways of growing and living by maintaining neutrality. First, the book makes an analogy to “handedness.” While few parents today would find it appropriate to force right-handedness upon their children, it was not long ago that left-handed people were not just in the minority, but viewed “as transgressive [or] even sinister.” In those days, parents and educators “expend[ed] some effort to reorient left-handed children,” while today, left-handedness is viewed as a neutral characteristic. Similarly, the authors suggest that most parents today would not choose to raise children to discriminate against persons of other races as a potential mate. They propose that raising children in a neutral way as to sexual orientation also would free them from gender-based expectations and prejudice. *Straightforward* ends the section on parenting with sensible, concrete steps parents can take at home, including nurturing a child’s growth as potentially heterosexual, bisexual, or homosexual, talking to children in gender-neutral ways about love and marriage, and talking openly about GLBT friends and relatives.

With regard to schools, *Straightforward* acknowledges that “parenthood confers special access to [this] battleground” for

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19. *Id.* at 24 (discussing EYE KOSOFSKY SEDGWICK, *How To Bring Your Kids Up Gay: The War on Effeminate Boys,* in TENDENCIES 156 (1993)).
20. *See id.* at 30-37.
21. *Id.* at 27-28.
22. *Id.* at 26.
23. *Id.*
24. *Id.* at 27.
25. *See id.* at 32-37.
26. *Id.* at 37-38.
equality and recommends that allies who are also parents face a responsibility to support GLBT students and teachers. The authors urge parents to speak out against the destructive myth equating homosexuality with predation, a myth that hampers equal employment of GLBT teachers. The authors also urge support for gay-straight alliance groups and recommend that parents pay attention to how homosexuality is treated in health or sex education classes. They also suggest that allies make sure that books and other materials reflect the variety of family compositions. They acknowledge that people who disapprove of homosexuality will claim a value-neutral presentation of homosexuality does not exist because, in their view, any presentation of homosexuality that does not include condemnation is approval.

27. Id. at 38-39.
28. Id. at 40. The case of Irizarry v. Board of Education, 251 F.3d 604 (7th Cir. 2001) presents an interesting point in that regard. The Chicago school district, witnessing the terrible toll homophobia takes on GLBT youth, sought to employ and retain GLBT teachers as a way to improve the schools, making them physically and emotionally safer. Id. at 606. A policy designed to retain GLBT teachers by extending domestic partner benefits to partners of GLBT employees, but not straight cohabitating employees, was challenged. Id. Judge Richard Posner, writing for the court, reviewed the school’s arguments that GLBT teachers, “who have a healthy acceptance of their own sexuality, can act as role models for GLBT students and promote tolerance among all students.” Id. Judge Posner indicated that “[t]his line of argument will shock many people even today; it was not that long ago when homosexual teachers were almost universally considered a public menace likely to seduce or recruit their students into homosexuality, then regarded with unmitigated horror. . . . It is not for a federal court to decide whether a local government agency’s policy of tolerating or even endorsing homosexuality is sound. . . . It is a fact that some school children are homosexual, and the responsibility for dealing with that fact is lodged in the school authorities, and (if they are public schools) ultimately in the taxpaying public, rather than in the federal courts.” Id. at 606-07.
29. AYERS & BROWN, supra note 1, at 43-44. The book illustrates the uphill battle gay-straight alliance groups face if administrators and parents do not work together to ensure a safe and supportive environment by citing the Minnesota case of Chambers v. Babbitt, 145 F. Supp.2d 1068 (D. Minn. 2001), where a student obtained an injunction allowing him to wear a sweatshirt with the words “Straight Pride” at school. The principal banned the sweatshirt “in light of offense taken by other students and the Principal’s safety concerns for [the student] and other Woodbury students” following two incidents, one involving vandalism to a car of a student thought to be gay and another involving a fight between a black student and a white student wearing a Confederate flag as a bandana. Id. at 1069. Judge Donovan Frank’s opinion includes several statements about the balance principals must strike between nurturing diversity, respecting freedom of speech, and maintaining a safe environment in which all students can learn. See id.
30. AYERS & BROWN, supra note 1, at 44.
In churches, *Straightforward* recommends that allies thoroughly understand the church’s official teachings on homosexuality. The book urges that allies then vocally encourage including GLBT people in open and affirming congregations and employing gay and lesbian clergy. *Straightforward* also stresses that allies should learn about GLBT groups within denominations and support groups such as Soulforce, a national network of people of faith seeking the “liberation of sexual and gender minorities from religious policies that exclude and discriminate against God’s GLBT people.”

The authors provide a panoply of practical ideas for allies to lend support to their GLBT co-workers in the workplace. These ideas range from getting to know GLBT employees to the adoption of Safe Space Programs. As part of Safe Space Programs, employees display an emblem signifying respect for GLBT people and intolerance for homophobic activities in that office.

Chapters Three and Four put forward the authors’ core concepts of the Vacation Pledge for Equal Marriage Rights and the Fair Employment Mark. Both concepts are based on the theory that it is better to reward than to punish. Thus, the authors argue that rather than boycott those adopting antigay policies, one should “buycott” by bestowing economic or other benefits to reward positive action. The Vacation Pledge for Equal Marriage Rights asks GLBT people and allies to sign the following pledge at www.vacationpledge.org:

> WE, the undersigned, promise to vacation in the first state that democratically chooses (by either legislation or voter referendum) to legalize same-sex marriage within three years of the effective date of the legalization.

The two key elements of the pledge are a requirement for democratic, rather than judicial, action and allowing three years to make good on the pledge. The second element neither unduly constrains those signing the pledge nor allows too much time so as to make the economic benefits meaningless. The authors have set an ambitious goal of collecting one million signatures to the vacation pledge by promoting the pledge through publication of this book, linking to the pledge site from www.straightforward

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31. *Id.* at 50.
32. *See id.* at 53-56.
33. *Id.* at 64.
34. *Id.* at 67.
book.com, linking to the pledge site from other institutions and organizations, emailing potential supporters with a link to the official pledge website, and publishing articles in various media sources. The authors “[estimate] that the present value of a change in marriage law[s] for the first-mover state could reach three or four billion dollars.” Further, the authors posit that continued benefits of first-mover status might inure to that state even after other states join suit by becoming the same sex marriage equivalent to what “Connecticut is to insurance, Delaware is to corporate law and Nevada is to gambling.” Nonetheless, the authors acknowledge that the key impact of the Vacation Pledge may be allaying legislators’ fears of economic loss from groups attempting to boycott that state, rather than convincing elected leaders of a promised economic windfall.

At first blush, this approach of offering up monetary rewards to bolster the case for human rights might appear unseemly. What the authors call “commodification” — placing an economic value on same-sex marriage — should not cause readers undue concern. The Vacation Pledge is merely another tool among many in the tool box of advocacy for equal rights. In light of threatened boycotts by groups opposing equality, it may become an extremely valuable tool to help alleviate concerns of otherwise supportive elected officials.

Borrowing from union-organizing principles, the proposed Fair Employment Mark provides yet another suggestion as to how supporters “of gay rights can vote with their wallets.” The simple concept would include “an innocuous symbol, such as FE inside a circle, [to announce to customers] that the company manufacturing the product has officially instituted and complied with a set of employment policies” that are free of discrimination against GLBT people. Administration of the mark would require a certifying entity, most likely a nonprofit, to scrutinize the employment practices of companies applying for the right to post the mark, so as to assure that they are committed to the values

35. Id. at 72.
36. Id. at 61.
37. Id. at 65.
38. Id. at 73.
39. Id. at 76.
40. Id. at 79.
41. Id. at 79.
reflected in the mark.\textsuperscript{42} The authors suggest that the Fair Employment Mark should aspire to achieve “[p]rogress . . . a real advancement in employment protections for [GLBT people]; efficient enforcement . . . [using] a broad spectrum of actors with incentives to monitor the behavior of companies using the mark; targeted transparency . . . recognizable to knowing consumers, but not so explicit [as to cause] uninformed consumers [who are] antigay . . . to avoid the product or service.”\textsuperscript{43}

The potential standards considered for the Fair Employment Mark vary significantly. The book advocates a simple standard such as whether the company adheres to the standards set forth in the proposed Employment Non-Discrimination Act (“ENDA”),\textsuperscript{44} which would include sexual orientation in the list of Title VII characteristics for which discrimination in employment is illegal.\textsuperscript{45} The authors also raise, but reject, more stringent standards, arguing that under the spirit of incrementalism informing the book, more stringent standards might compromise the intended effect of the Fair Employment Mark.\textsuperscript{46} The authors’ rejection of the Human Rights Campaign’s (“HRC”) Corporate Equality Index, which includes such inexact criteria as “whether the company advertises to the LGBT community, sponsors LGBT events or makes charitable gifts to an LGBT or HIV/AIDS-related community organization,”\textsuperscript{47} seems sensible. Somewhat questionable is the authors’ rejection of additional standards that are quickly becoming commonplace in corporate America, such as whether the company offers health care and other benefits to the same-sex partners of its employees and whether a company includes transgender employees as part of its employment non-

\textsuperscript{42} Id. at 80. The authors note that the “certification cannot be based on a user’s willingness to pay a fee to the owner of the mark (other than a minimal fee covering administrative costs). In effect, the certifying entity must operate as a nonprofit.” Id.

\textsuperscript{43} Id. at 80-81.

\textsuperscript{44} S. 1705, 108th Cong., 1st Sess. (2003). The authors note that this is “a bill that has been proposed repeatedly since 1993 but not yet enacted by Congress.”\textsuperscript{45} AYERS & BROWN, supra note 1, at 81.


\textsuperscript{46} AYRES & BROWN, supra note 1, at 86.

\textsuperscript{47} Id. at 83; see Corporate Equality Index, http://www.hrc.org/Template.cfm?Section=Corporate_Equality_Index&Template=/TaggedPage/TaggedPageDisplay.cfm&TPLID=23&ContentID=28960 (last visited Nov. 20, 2005).
discrimination code. However, in view of the fact that the Fair Employment Mark is meant to complement, not displace, other measurements of a company’s dedication to equality, the authors’ rejection of the more complex and difficult-to-enforce standards is acceptable.

III. DISABLING PRIVILEGE

As mentioned earlier, the key to Straightforward’s recommendation on how to disable heterosexual privilege is the ambiguation of sexual orientation. This might take the form of “permitting confusion about whether or not [a person is] gay, forgoing opportunities to identify opposite sex” partners, or not making qualifying statements that would identify the speaker’s heterosexuality.48 While ambiguation can be useful in advancing equality, the authors recognize the inherent dangers of misusing this technique. Ambiguation might be used to trivialize sexual orientation or act to re-closet GLBT people.49 When used properly, however, ambiguation could be an indispensable tool to combat prejudice. The authors discuss one example of ambiguation that was purportedly employed in Denmark during World War II when all Danes, Jew or gentile, wore the yellow Star of David to protect Jewish Danes from the Nazis.50 Another powerful example cited by the authors was an occasion when a lesbian’s house was vandalized and her rainbow flag burned. After learning of this, every neighbor on her block displayed a rainbow flag. This display showed solidarity and caused an ambiguating effect in case the vandals thought about returning.51

The most intriguing use of ambiguation is presented in Chapter Eight, which explains a possible means of integrating the military and eventually eliminating the current “don’t ask, don’t tell” (“DADT”) policy. Former General Colin Powell has referred to gay service members as “proud, brave, loyal, good Americans”52

48. Ayres & Brown, supra note 1, at 98.
49. Id. at 108-13.
50. Id. at 99 (citing Lawrence Lessig, The Regulation of Social Meaning, 62 U. CHI. L. REV. 943, 1010 (1995)). But see Ayers & Brown, supra note 1, at 99 nn.7-9. The authors note that this is “legend,” and “[h]istorians have been unable to document this as having actually happened.” Id. (citing inter alia Kings and Citizens: The History of the Jews in Denmark 1622-1983 (Jorgen H. Barfod et al. eds., 1983)).
51. Ayers & Brown, supra note 1, at 102-03.
52. Id. at 116 (citing Department of Defense Appropriations for 1993: Hearings
who have "served well in the past and are continuing to serve well." General Norman Schwartzkopf states that "homosexuals have served in the past and have done a great job." The European Court of Human Rights requires inclusion of openly gay people in European military forces. Studies show that "American personnel are able to interact and work successfully with acknowledged gay personnel from foreign militaries." "A CNN/Gallup poll conducted in December 2003 found that seventy-nine percent of all Americans believed that gay and lesbian service members should be able to serve openly in the military." Nonetheless, even in times when it is increasingly difficult to attract recruits for military service, openly GLBT people are excluded from serving their country in the U.S. military. The authors note that while the old pretexts of imagined security risks, cowardice, and mental illness of gay people have been thoroughly discredited, today's argument for excluding gay service members rests upon elusive claims of undermining unit cohesion, invading heterosexual privacy, and creating sexual tension." Straightforward recommends an elegant solution to dispel these excuses for discrimination against GLBT people: the inclusive command.

The inclusive command proposed by Straightforward would allow gay and non-gay soldiers to "volunteer for inclusive commands by indicating that they are willing to serve with gay and lesbian soldiers." The authors propose an incremental approach that, if adopted, likely would serve the military well. In stage one,
DADT could continue its existence and soldiers would be asked two questions:

Question No. 1: Your answer to this first question will be kept confidential (and your answer will have no effect on your future assignments or treatment). Would you be willing to serve in a command with openly gay service personnel?

Question No. 2: Your answer to this second question will not be kept confidential. If you answer “no,” you will be assigned to an “inclusive” command. If you answer “yes,” you will be assigned to an “exclusive” command. Would you prefer to serve in a command without any gay personnel?\(^\text{60}\)

In stage two, following modification of DADT so as to allow—but not require—GLBT service members of inclusive commands to come out, all soldiers would be asked a single question:

Your answer to this question will not be kept confidential. If you answer “yes,” you will be assigned to an “inclusive” command. If you answer “no,” you will be assigned to an “exclusive” command. Would you be willing to serve in a command with openly gay service personnel?\(^\text{61}\)

The proposed inclusive command would help debunk and challenge the present justifications for disqualifying openly GLBT people from military service. It would demonstrate that unit cohesion does not require the exclusion or closeting of gay and lesbian soldiers, and it would ameliorate current discrimination. While it would not force complete integration today, it would take a step toward equality that is likely necessary to accomplish the eventual goal of full integration. This method offers an incremental approach with historic parallels in public school integration.\(^\text{62}\)

The book anticipates many of the problems that could be encountered in an inclusive command structure, such as the requirement of some “tipping point” in the number of personnel willing to serve in the inclusive command so as not to make the unit automatically viewed as a gay-only unit. Additionally, the authors explore possible objections as to the administrative burdens of two commands, exclusive and inclusive.\(^\text{63}\) Each of the anticipated objections is deftly handled and explained. The book’s

\(^\text{60}\) Id. at 117.
\(^\text{61}\) Id.
\(^\text{62}\) Id. at 125-30.
\(^\text{63}\) Id. at 138-40.
conclusion correctly emphasizes that an inclusive command could not succeed without support from higher-ranking officers. This support would be necessary to keep inclusive commands from seeming experimental or uncertain, thereby allowing opponents to stymie the change or “prove” that it cannot work.  

IV. RENOUNCING PRIVILEGE

There may be times when the only legitimate strategy to advance gay rights is to publicly renounce and quit membership in a discriminatory organization. Before doing so, it would be helpful to know which organizations discriminate and which do not. Obtaining knowledge of an organization’s discriminatory policies at the point of joining that organization is not as easy as it seems, and this is the genesis of the book’s suggested Informed Association Statute.

The U.S. Supreme Court case of Boy Scouts of America v. Dale highlights the need for an Informed Association Statute. In that case, the Supreme Court ruled that the Boy Scouts of America’s First Amendment rights of “expressive association” would be violated if the Boy Scouts were forced to associate with a gay Scoutmaster. Therefore, the Court overruled a lower court’s determination that New Jersey’s public accommodation law prohibited this discrimination.

The majority of the Supreme Court was persuaded by the Boy Scouts’ contention that the Scout Oath to remain “morally straight” and “clean” was a clear condemnation of homosexuality as immoral and that the Boy Scouts had a First Amendment right to associate expressly with straight people who believed similarly. Oddly enough, despite the “clarity” ascribed to the Scout Oath by the majority of the Court, Steven Spielberg and thousands of other members of the Boy Scouts were unaware that they belonged to an anti-gay and pro-discriminatory organization. They quit. Similarly, cities, school districts, and churches that were made aware of the Boy Scout’s discriminatory practices pulled their

64. Id. at 142.
66. Id. at 659.
67. Id.
68. Id. at 641.
69. Ayres & Brown, supra note 1, at 152.
support from the organization.70
The book seeks to remedy the confusion that Boy Scouts supporters and others may face by proposing a statute requiring that organizations obtain written acknowledgments from their members, stating:

I, the undersigned, acknowledge that I am choosing to associate with an organization that retains the right to discriminate on the basis of sexual orientation.71

This Informed Association Statute would allow people to make a reasoned choice either to join organizations that discriminate on the basis of sexual orientation or to “renounce privilege” by refusing to join those organizations.

Chapter Eight then asks whether it is ever ethical to take a benefit by joining organizations that discriminate against others when that benefit is invidiously denied others.72 This is not an easy question. In many respects, people committed to equality of GLBT people will belong to such organizations and may wonder what difference it could possibly make to quit them. For example, many will belong to a church that refuses to ordain gay clergy; others may work for an employer that refuses to give equal employment benefits; almost everyone has the opportunity to attend a wedding of straight friends while the right to marry is denied to GLBT people. The crux of the authors’ argument is summed up in a question that forces a comparison to race discrimination: Would you “drink at a whites-only water fountain even if no one else was around to see?”73

The book explores two alternate responses when someone is faced with membership or participation in an organization that discriminates against GLBT people: renounce or share.74 The meaning of renouncing membership or quitting the organization is clear. The authors contend that the choice to resign from discriminatory organizations is always present and should always be considered. Indeed, if faced with signing the Informed Association consent form acknowledging that membership in an organization is fostering discrimination, the difficult nature of that choice would be abundantly clear.

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70. Id. at 149-51.
71. Id. at 147.
72. Id. at 162.
73. Id. at 163.
74. Id. at 162.
The idea of sharing is simple as well, albeit less intuitive. The authors recommend that rather than quit, allies may be able to determine how to divide their participation so that a share will benefit the struggle for equality. So, for example, if an ally decides to remain a member of a church that discriminates against GLBT people, he or she could take a portion of what he or she would give to that church and donate it to a GLBT advocacy organization. Or, if allies are going to marry, they could decide to marry in jurisdictions such as Massachusetts, where GLBT people have similar marriage rights. This is sensible. Asking allies never to marry, never to attend a wedding, or never to associate with married people until all GLBT people have equal marriage rights, as well as to quit membership in their churches until GLBT clergy are hired by the church, may be asking too much of allies and even GLBT people. Pro-rata sharing is an option presented by the authors along the lines of incrementalism expressed earlier in the book. It allows continued participation where it is reasonable for the time being.

The book concludes with guidance on how allies, when encountering discrimination, can choose one of the many strategies outlined in the book. The authors suggest that allies “might give the victims of discrimination their proxy” by deferring to the preferences of gay rights advocacy organizations. Undoubtedly, these advocacy groups will need to do more to attract membership from allies and focus on how to serve the needs of allies who seek guidance. Deferring to these organizations creates the benefit of economizing decisions, but it will also require trusting that the advocacy organizations have researched the most effective strategies to combat prejudice, that they are coordinating efforts, and that they are able to persuade decision makers.

The question then becomes how to select among the many GLBT advocacy organizations: which one to join and how much to defer to that organization. The authors recommend carefully researching the many GLBT advocacy organizations and choosing the one that most closely follows the ally’s area of interest. Nonetheless, there will be times when these advocacy organizations cannot suggest action that is necessary to advance gay rights. For example, very few groups would have wished to be seen

75.  Id. at 179.
76.  Id. at 182-83.
coordinating a mass exodus from the Boy Scouts following the Supreme Court’s decision in the *Dale* case.\textsuperscript{77} As a result, the book recommends a policy of qualified deference to the GLBT organizations based on the transparency of the representation of the GLBT community, the clarity of the instruction from the organization, consideration that the organization may wish to maintain plausible deniability in areas where action might be necessary, and the amount of time, money, and energy the ally is willing to commit.\textsuperscript{78}

V. CONCLUSION

*Straightforward* exhorts its readers to do something to advance the cause of equality for GLBT people.\textsuperscript{79} Given the book’s many excellent suggestions, the problem a committed reader will have is not what there is to do, but which of the many choices to exercise and when to do so. In that regard, the book has provided not only eye-opening choices, but also practical guidance for those who wish to join the struggle to end discrimination against GLBT people.

\begin{itemize}
\item \textsuperscript{77} Id. at 186-87.
\item \textsuperscript{78} Id. at 189.
\item \textsuperscript{79} Id. at 192.
\end{itemize}