

4-30-2016

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Recommended Citation

Milone, Abigail. "Seen, But Now Heard: How Increased LGBT Visibility Contributed to Cultural Acceptance of Gay Marriage." Paper presented at the Phi Alpha Theta Upper New York Regional Conference, Plattsburgh, N.Y., April 30, 2016.
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Seen, But Now Heard:
How Increased LGBT Visibility Contributed to Cultural Acceptance of Gay Marriage

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Phi Alpha Theta Regional Conference
April 30, 2016

With the Supreme Court's ruling in *Obergefell v. Hodges* on June 26, 2015, the long fight for gay rights finally peaked with the national legalization of gay marriage. In comparison to the shift favoring the women's rights and civil rights movements, which happened gradually over nearly two hundred years, public opinion and legal opinion on gay rights reversed in an historical instant of just 35 years, and even grew to include mass support of gay marriage, a concept that had never even been seriously considered prior to this period. How did this change happen so rapidly? This success was the direct result of a sharp spike in gay visibility, catalyzed by the AIDS crisis, which spurred two interrelated phases of response in the following years: legal action, and popularization and acceptance of "coming out movements" in very recent years.

The goal from the beginning, led by the most liberal section of the gay community, was not marriage, but simply to create an environment that would tolerate gays that were "out of the closet." Prior to the outbreak of the AIDS crisis in 1981, LGBT people were not highly visible to the general population. Unlike race or gender, homosexuality was not an obvious difference. Additionally, while over 50% of the American population were women and 11.7% were African-American in 1980, no one knew how many people were gay.¹ Furthermore, only 2.8% of men and 1.4% of women self-identified as LGBT individuals even in a 1990 study, so it appeared that few people were directly affected by the lack of gay rights and there was little motivation on the behalf of the general populace to help change it.² For this reason, gay people faced many of the same issues as mentally ill people because they suffered from invisibility; in fact, until 1973, the American Psychiatric Association believed that being gay was a form of mental illness.³

¹ U.S. Census Bureau, "1980 Census of Population: General Population Characteristics United States Summary," 15 (Figure 15), 12 (Figure 9), accessed December 14, 2015, http://www2.census.gov/prod2/decennial/documents/1980/1980censusofpopu8011u_bw.pdf.

² Edward O. Laumann, et. al. *The Social Organization of Sexuality: Sexual Practices in the United States* (Chicago: University of Chicago Press, 1994), 297.

³ "Timeline: Milestones in the American Gay Rights Movement," PBS, accessed December 14, 2015. <http://www.pbs.org/wgbh/americanexperience/features/timeline/stonewall/>.

Although limited but passionate gay activism had already happened sporadically, especially in largely gay areas of San Francisco and New York City, a significant event was required to catapult it into the public eye. The public's initial reaction to the AIDS crisis was confusion, panic, and disgust –signifying that it would be anything but a step toward gay toleration of any sort, much less gay marriage. However, the AIDS crisis provided that central issue around which a more sustained, organized movement could form, as increasing public understanding of AIDS and empathy for gay communities became the goal. After the disease was discovered spreading in New York and California gay communities, Bruce Voeller, of the National Gay Task force fought the stigma of AIDS being a gay-only disease by successfully lobbying for the name to be changed from Gay Related Immune Deficiency Disorder (GRID) to AIDS. On October 11, 1987, activists organized the National March on Washington in an attempt to force President Reagan to publically recognize the problem. In 1991, Visual AIDS selected the red ribbon as the emblem of AIDS, providing a visual symbol around which supporters could rally.⁴ All of these advocacy groups were responsible for raising public consciousness of the actual connection between AIDS and homosexuality.

Meanwhile, the Center for Disease Control and Prevention (CDC), under the direction of Surgeon General C. Everett Koop, attacked the hysteria on a crucial, unprecedented scale by distributing an informational pamphlet on the disease to all 107 million households in the United States from May to June of 1988.⁵ The document, called “Understanding AIDS”, broke down the disease very simply, debunking common misconceptions about the nature and spread of the virus, including the false notions that it could be spread through kissing, sharing a restroom, or swimming in the same pool, in an attempt to break down the stigma of it being a gay men's

⁴ “Timeline,” PBS, <http://www.pbs.org/wgbh/americanexperience/features/timeline/stonewall/>.

⁵ *Ibid.*

disease. It also explained that although gay men had a reputation for contracting AIDS, it could be spread through any of the noted “risky behaviors,” from needle sharing during drug use to sex with little-known partners of either sex. As Carol, one featured interviewee, pointed out, “Obviously women can get AIDS. I’m here to witness to that. AIDS is not a ‘we,’ ‘they’ disease, it’s an ‘us’ disease”.⁶

The AIDS crisis also served to increase visibility by forcibly outing some celebrity individuals who would otherwise have remained hidden. Many celebrities, most notably actor Rock Hudson in 1986, were dragged into the spotlight and forced out of the closet through the contraction of AIDS.⁷ Retrospectively, some people made the direct connection between the AIDS epidemic and gay marriage, citing a new public awareness. Steve Mendelsohn, a gay man commenting after New York legalized gay marriage in 2011, posited, “I believe that there wouldn’t be any gay marriage today if it weren’t for AIDS... there was so much intolerance and misunderstanding about who was gay and who wasn’t until everyone found out that people were gay because they were dying. And it was their friends, their family, their relatives”.⁸

As Mendelsohn realized, even more important were the members of the general populace who were forcibly outed through contraction of AIDS. This phenomenon laid the foundation for increasing visibility through legal means and introducing the necessity for legally recognized same-sex partnerships. AIDS infected approximately 774,000 people between 1981 and 2000, and nearly 450,000 of them died during that period.⁹ Hospitalization and major medical treatments required people to make very serious decisions, a responsibility that would normally fall to spouses. However, since gay people could not marry, even long-term, invested partners

⁶ U.S. Department of Health and Human Services, “Understanding AIDS,” 2, accessed December 14, 2015, <http://profiles.nlm.nih.gov/ps/access/QQBDR.pdf>.

⁷ Stephen M. Engel, *The Unfinished Revolution: Social Movement Theory and the Gay and Lesbian Movement* (Cambridge: Cambridge University Press, 2001), 48.

⁸ Austin Considine, “Gay Marriage Victory Still Shadowed by AIDS,” *New York Times* (New York, NY), January 1, 2012.

⁹ Center for Disease Control and Prevention, “HIV and AIDS--- United States, 1981—2000,” *Morbidity and Mortality Weekly Report* 50:21 (June 1, 2001), 430-4.

had absolutely no legal say in those decisions. As a result, groups began to lobby for increased legal rights, including marriage.

A handful of liberal cities attempted to reach a legal compromise by recognizing civil unions. In 1985, West Hollywood, California, became one of the earliest cities to recognize them. Although they provided a handful of benefits that could help the partners of people with AIDS, such as granting them jail and hospital visitation rights, they had a number of strict limitations, including the struggle for insurance coverage and rent control laws. Most importantly, the small amount of legal protection provided by civil unions could not extend past city limits.¹⁰ However, the trend of legalizing civil unions spread to a small handful of liberal states and Washington, D.C. State-wide civil unions were first legalized in Vermont in response to a Vermont Supreme Court order to grant gay couples marriage rights, or separate but approximately equal rights. State legislators devised a plan for civil unions as a compromise that “sounded dignified” without including the word “marriage,” since the Democratic governor Howard Dean informed them that he would veto any legislation with that specific term.¹¹ However, although these legal unions certainly improved gay rights, they did not guarantee any of the rights offered to a traditional marriage under federal law. Instead of appeasing LGBT activists while preserving the traditional definition of marriage as lawmakers had originally intended, the movement toward civil unions only inspired these activists to continue pushing.

Prior to November 2003, gay marriage, as the equal institution it is defined as today, was hardly in the sights of the general public, and was certainly not favored by it. A 2002 Gallup poll analysis referred to the “hot topic” of “same-sex marriages,” but the ensuing paragraph instead discussed civil unions which would grant homosexual couples “some [note, but not all] of the

¹⁰ Stephen Braun, “Law Lists Rights, Lack Teeth: Intent of W. Hollywood Domestic Partnership Ordinance Clear but Impact Isn’t,” *Los Angeles Times* (Los Angeles, CA), February 28, 1985.

¹¹ Liz Halloran, “How Vermont’s ‘Civil’ War Fueled The Gay Marriage Movement,” NPR, March 27, 2013, accessed December 14, 2015. <http://www.npr.org/2013/03/27/174651233/how-vermonts-civil-war-fueled-the-gay-marriage-movement>.

legal rights of married couples.”¹² In June 2003, on the eve of the Massachusetts gay marriage case, Americans were nearly equally split on the issue of civil unions, demonstrating some increased toleration, but marriage, the very word of which held strong sacred and traditional connotations, was still frowned upon. It had only 39% approval, which, though up from previous years, was still far from the majority opinion.¹³

In the landmark 2003 Massachusetts Supreme Court case of *Goodridge v. Massachusetts Department of Public Health*, the Court heard an appeal from Hillary and Julie Goodridge, who in 2001 had applied with a number of other gay and lesbian couples for marriage licenses that were denied.¹⁴ The case was appealed to the Massachusetts Supreme Court, which decided in a 4-3 ruling that civil unions were not equal to marriage, and that marriage licenses must be extended to same-sex couples as well. The Court redefined marriage as the “voluntary union of two persons as spouses, to the exclusion of all others.” While it may have upset some people’s religiously-based definition of marriage, Chief Judge Marshall argued that it kept the two main goals of marriages from the state’s perspective – “providing a stable setting for child rearing and conserving State resources” – intact.¹⁵ Concurring Judge Greaney cited the equal protection clause of the Declaration of Rights, which had a function comparable to that of the 14th U.S. Constitutional Amendment, and related the case to *Loving v. Virginia*, which struck down anti-miscegenation laws, as a precedent for interference with discriminatory marriage laws.¹⁶

With this groundbreaking decision, marriage replaced civil unions as the new prize for LGBT activists. As Vermont state Representative William Lippert, the only openly gay

¹² Darren K. Carlson, “Acceptance of Homosexuality: A Youth Movement,” Gallup, February 19, 2002, accessed December 14, 2015. http://www.gallup.com/poll/5341/Acceptance-Homosexuality-Youth-Movement.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles.

¹³ Linda Lyons, “U.S. Next Down the Aisle Toward Gay Marriage?,” Gallup, July 22, 2003, accessed December 14, 2015.

http://www.gallup.com/POLL/8881/US-NEXT-DOWN-AISLE-TOWARD-GAY-MARRIAGE.ASPX?G_SOURCE=ACCEPTANCE&G_MEDIUM=SEARCH&G_CAMPAIGN=TILES

¹⁴ “*Goodridge vs. Department of Public Health* (2003),” University of California San Diego, accessed December 14, 2015, http://philosophyfaculty.ucsd.edu/faculty/rickless/Rickless/Courses_files/Lecture23-2007-Goodridge.pdf.

¹⁵ *Goodrich v. Department of Public Health*, 440 Mass. 343 (2003).

¹⁶ *Ibid*, 344-7.

legislator in that state, explained, civil unions, "went quickly from being the most cutting-edge thing to be attacked...to being the conservative alternative to marriage equality."¹⁷ Most states would be asked to make the enormous jump straight from no recognition of LGBT people, many of them just having repealed sodomy laws after the Supreme Court ruled that they were illegal on June 26, 2003,¹⁸ to integrate them into marriage, one of the most formalized, spiritualized, and culturally important institutions in the United States. Since the formation of the United States, marriage had been legally defined as the union of a man and a woman. Traditional marriage included a number of ideas and values, including the ceremony as a formal public announcement of a lifelong commitment and marriage as a means of preserving sex as an act to bring spouses closer to their life partners through marriage. As such, asking for marriage rights, rather than simply living together or seeing long term or one-time partners sporadically, was actually a conservative means to gain a liberal end of homosexual acceptance.

The push for gay marriage also coincided with the increasing acceptability of other more liberal marital standards. For example, sex between an unmarried man and woman, having a baby outside of marriage, interracial marriage, and polygamy have all been increasingly accepted in recent years.¹⁹ Why, then, was gay marriage able to differentiate itself from these other practices and go from nearly unnoticed but widely condemned to accepted by the American majority in the same time span?

In addition to increased visibility within the legal community, LGBT issues also increased in prominence in the scientific community. Unlike other taboo sexual practices like polygamy, which had previously been lumped into the same category as homosexuality under

¹⁷ Halloran, "How Vermont's 'Civil' War Fueled The Gay Marriage Movement," <http://www.npr.org/2013/03/27/174651233/how-vermonts-civil-war-fueled-the-gay-marriage-movement>.

¹⁸ "Timeline," PBS, <http://www.pbs.org/wgbh/americanexperience/features/timeline/stonewall/>.

¹⁹ "Marriage: Gallup Historical Trends," Gallup, 2015, accessed December 14, 2015.

<https://ilearn.marist.edu/access/content/attachment/0716626b-ff2a-4223-8f8e-27bbdc4596ad/Forums/36d7b66f-42b1-47f2-b1d9-5453a81dfd00/Marriage%20-%20Gallup%20Historical%20Trends.pdf>.

sodomy laws, gay marriage came to be increasingly viewed not as a choice but as at least in part as an innate wiring. If humans were all “Born This Way,” as modern pop singer Lady Gaga proclaimed in her 2011 hit song (fittingly, but not coincidentally, released in the same year as the national American majority opinion shifted in favor of gay marriage), then the difference is not something that can easily or should be changed; instead, it should be celebrated. This mentality shift was represented by a shift in terminology from “sexual preference” to “sexual orientation,” to recognize the lack of choice in one’s sexuality. While the issue remains contested, only recently has the “born or made” issue reached a tipping point. In May 2012, a Gallup poll noted for the first time that 51%, a slim majority of Americans, believed that it was an innate trait.²⁰

Socio-scientific studies also alleviated many concerns that children raised by gay parents would be at a disadvantage. As Chief Justice Marshall stated in her majority opinion in 2003, she believed the cause of any disadvantage was not homosexuality, but the lack of stability that came with legally recognized marriage.²¹ Although it is still debated in some circles, 73 of 77 studies published between 1980 and 2015 found that children raised by homosexual parents were at no disadvantage compared to children raised in heterosexual households.²²

When the social fabric in Massachusetts did not implode from gay marriage, a handful of other states slowly followed suit, with four more states and Washington D.C. legalizing it between 2008 and 2010.²³ These legalizations slowly increased Americans’ perceptions of the normalcy of gay people, allowing more people to feel comfortable coming out, which multiplied the normalization effect. While LGBT people were previously marginalized and easy to ignore,

²⁰ Jeffery M. Jones, “Majority in U.S. Now Says Gays and Lesbians Born, Not Made,” Gallup, May 20, 2015, accessed December 14, 2015. http://www.gallup.com/poll/183332/majority-say-gays-lesbians-born-not-made.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles.

²¹ *Goodrich v. Department of Public Health*, 440 Mass. 309 (2003).

²² “What does the scholarly research say about the wellbeing of children with gay or lesbian parents?”, Columbia Law School, 2015, accessed December 14, 2015. <http://whatwewknow.law.columbia.edu/topics/lgbt-equality/what-does-the-scholarly-research-say-about-the-wellbeing-of-children-with-gay-or-lesbian-parents/>.

²³ “Same-Sex Marriage, State by State,” Pew Research Center, June 26, 2015, accessed December 14, 2015. <http://www.pewforum.org/2015/06/26/same-sex-marriage-state-by-state/>.

they were now visible in numbers and had faces and names people could relate to. The final stage of visibility required personal involvement of the non-gay populace with the gay populace, through someone they felt they knew well, from celebrities and athletes to television characters to real-life personal friends, family members, or coworkers.

Celebrities only began coming out en masse over the past few years, but a few paved the way beforehand, with Ellen DeGeneres leading the way in 1997.²⁴ Internationally acclaimed pop and soul singer Sam Smith said, “I want to make it [homosexuality] a normality because this is a non-issue. People wouldn’t ask a straight person these questions.”²⁵

More significantly, professional athletes defied the implied masculinity of sports and its supposed incompatibility with homosexuality, including NBA player Jason Collins, “the first openly gay athlete playing in a major American team sport,”²⁶ Sochi Olympics stars Billie Jean King, Caitlin Cahow, and Brian Boitano; soccer players Abby Wambach, Megan Rapinoe, and Lori Lindsey.²⁷ Celebrities from other strongly gendered fields, such as country music singer Ty Herndon and former Miss Kentucky Djuan Trent, also contributed to the increased normalcy. The more people chose to come out, the easier it was for the American public to accept homosexual relationships as a normal facet of society, which by extension meant that they should also be granted equal rights, including the right to marry.

Additionally, watching gay television characters allowed Americans to safely explore the hypothetical implications of integrating openly gay people into a predominantly heterosexual society, including gay marriage, through situations onscreen before allowing them to play out in

²⁴ “Marriage: Gallup Historical Trends,” https://ilearn.marist.edu/access/content/attachment/0716626b-ff2a-4223-8f8e-27bbdc4596ad/Forums/36d7b66f-42b1-47f2-b1d9-5453a81dfd00/Marriage%20_%20Gallup%20Historical%20Trends.pdf.

²⁵ Jessica Robertson, “Cover Story: Sam Smith,” *Fader* 92 (June/July 2014), accessed December 14, 2015, <http://www.thefader.com/2014/05/28/cover-story-sam-smith-opens-up-about-life-and-love>.

²⁶ Jason Collins, “Why NBA center Jason Collins is coming out now,” *Sports Illustrated*, June 20, 2014, accessed December 24, 2015, <http://www.si.com/more-sports/2013/04/29/jason-collins-gay-nba-player>.

²⁷ Kiley Kroh, “In The Goal, And Out Of The Closet, At The Women’s World Cup,” *Think Progress*, June 30, 2015, accessed December 14, 2015. <http://thinkprogress.org/sports/2015/06/30/3675611/goal-closet-womens-world-cup/>.

real life. While many shows had previously only portrayed LGBT characters in a negative light if at all, a handful pushed the envelope on gay marriage by portraying loving gay couples in committed long-term relationships as no different than heterosexual couples. The first gay wedding on network television was in Fox's sitcom *Roc* in 1991, twelve full years before the Massachusetts case. *Friends* followed in 1996, then several more shows after the court case.²⁸ Recently, the American Civil Liberties Union, an activist group whose liberal causes include gay rights, recognized the effect television could have on public opinion and petitioned ABC to write a gay wedding into their Emmy award-winning show *Modern Family* once the real-life Proposition 8 was repealed in California, the setting of the show.²⁹ Television shows also reinforced the findings of studies on gay parenting of adopted children or kids from previous heterosexual marriages. These shows, permeating people's homes and emotions on a weekly basis, helped make the concerns of gay people mutual human concerns.

Encouraged by the increasing normalization of people coming out, the trend continued through everyday people –non-celebrities or fictional characters –coming out to their family, friends, and coworkers. Perhaps the overall national decline in organized religion related to the comfort level of people coming out in recent years, since religiosity was correlated with more conservative views on homosexuality.³⁰ Still, the groups most resistant to gay marriage have been white Evangelical Protestants, with only 24% percent in favor. However, even people who have remained religious have become more tolerant of gay marriage.³¹ A variety of reasons, ranging from scientific evidence –which had previously caused the Catholic Church to change its stance on evolution –to human compassion, influenced the Church to change its official position

²⁸ Katy Kroll, "The Best Gay Weddings on TV (So Far)," *Rolling Stone*, July 13, 2013, accessed December 14, 2015., <http://www.rollingstone.com/movies/news/the-greatest-gay-weddings-on-tv-so-far-20130713>.

²⁹ "Lobbying Modern Family for gay couple wedding," *Telegraph-Journal* (Saint John, New Brunswick), May 17, 2013.

³⁰ Linda Lyons, "Teens on Homosexuality: Nature or Nurture?," Gallup, March 18, 2003, accessed December 14, 2015.

http://www.gallup.com/poll/8005/Teens-Homosexuality-Nature-Nurture.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles.

³¹ "Changing Attitudes on Gay Marriage," Pew Research Center, July 29, 2015, accessed December 14, 2015.

<http://www.pewforum.org/2015/07/29/graphics-slideshow-changing-attitudes-on-gay-marriage/>.

on the issue. In July 2013, Pope Francis stopped condemning gay marriage. Instead, he encouraged Catholics to love all people and leave the judgment for God, saying, “If someone is gay and is searching for the Lord and has good will, then who am I to judge him?”³²

Acceptance of homosexuality has greatly increased over the past few years, especially in young people. Millennials, defined as people born after 1980,³³ are more accepting of LGBT people than their parent’s cohort and significantly more accepting than people their grandparent’s age.³⁴ Some of this toleration may be learned from parents whose attitudes toward gay marriage shifted toward LGBT toleration, but many of them have matured and absorbed their stances on social issues in a time post-*Goodridge v. Department of Public Health*. Many schools have implemented programs to combat bullying of LGBT students, including teacher training, “gay-straight alliances, nondiscrimination policies, safe schools programs, and curricula designed to provide positive and inclusive examples of the contributions that LGBT people have made to American and world culture”.³⁵ Where individual schools sometimes failed, states sometimes intervened with anti-bullying laws. As poll analyst Linda Lyons accurately predicted in 2003, “Younger Americans may soon consider this debate a non-issue.”³⁶

A May 2009 Gallup poll, conducted while 57% of respondents were still opposed to gay marriage, found that people who personally knew someone who identified as gay or lesbian were significantly more likely to support gay marriage than those who did not personally know someone. In fact, while the latter group was divided 72% opposed and 27% in favor, the former

³² “Apostolic Journey to Rio De Janiero On the Occasion of the XXVIII World Youth Day: Press Conference of Pope Francis During the Return Flight,” July 28, 2013, accessed December 14, 2015, http://w2.vatican.va/content/francesco/en/speeches/2013/july/documents/papa-francesco_20130728_gmg-conferenza-stampa.html.

³³ Catherine Cloutier, “Most young Americans overwhelmingly support gay marriage,” <https://www.bostonglobe.com/news/nation/2015/06/26/almost-millennials-support-same-sex-marriage/upgBZbZ9IvJXY0ZMOElgtN/story.html>.

³⁴ Catherine Cloutier, “Most young Americans overwhelmingly support gay marriage,” Boston Globe, June 26, 2015, accessed December 14, 2015. <https://www.bostonglobe.com/news/nation/2015/06/26/almost-millennials-support-same-sex-marriage/upgBZbZ9IvJXY0ZMOElgtN/story.html>

³⁵ Jason Cianciotto and Sean Cahill, *LGBT Youth in America’s Schools* (Ann Arbor: University of Michigan Press, 2012), 69, 59.

³⁶ Linda Lyons, “Teens on Homosexuality: Nature or Nurture?”, http://www.gallup.com/poll/8005/Teens-Homosexuality-Nature-Nurture.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles.

actually favored gay marriage by a very small margin of 49% in favor and 47% opposed.³⁷ When celebrities, television characters, and personal acquaintances increasingly normalized coming out, it encouraged other LGBT people to come out as well. This snowball effect made the general population more tolerant of marriage equality and gay rights in general, which then provided a more welcoming environment for other LGBT people to reveal their sexuality.

Finally, seven years after the Massachusetts court's legalization of gay marriage, national public opinion shifted in its favor for the first time. As recorded in a May 2011 Gallup poll, 53% of respondents were in favor of marriage equality.³⁸ Most recognized that discrimination against gay men and lesbians is a problem.³⁹ This switch in public opinion to 60% approval caused 37 states to independently legalize gay marriage in the years preceding *Obergefell vs. Hodges* because it made gay relationships appear to be relatively conservative and very similar to traditional relationships, with the same desires and rituals.⁴⁰

All of the aforementioned factors played into the June 26, 2015 decision made in *Obergefell vs. Hodges*, a case brought before the Supreme Court on behalf of many couples who sought to have their marriages validated in four different states by challenging the constitutionality of their bans under the Fourteenth Amendment's Equal Protection Clause and Due Process Clause.⁴¹ The decision came exactly two years to the day after the Court's decision in *United States vs. Windsor*, that struck down part of the Defense of Marriage Act to allow the federal government to recognize same-sex marriages. The Supreme Court upheld the plaintiff's

³⁷ Lymari Morales, "Knowing Someone Gay/Lesbian Affects Understanding of Gay Issues," Gallup, May 29 2009, accessed December 14, 2015. http://www.gallup.com/poll/118931/Knowing-Someone-Gay-Lesbian-Affects-Views-Gay-Issues.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles.

³⁸ Frank Newport, "For First Time, Majority of Americans Favor Legal Gay Marriage," Gallup, May 20, 2011, accessed December 14, 2015. http://www.gallup.com/poll/147662/First-Time-Majority-Americans-Favor-Legal-Gay-Marriage.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles

³⁹ Jeffrey M. Jones, "Most in U.S. Say Gay/Lesbian Bias Is a Serious Problem," Gallup, December 6 2012, accessed December 14, 2015. http://www.gallup.com/poll/159113/most-say-gay-lesbian-bias-serious-problem.aspx?g_source=acceptance&g_medium=search&g_campaign=tiles

⁴⁰ "Marriage: Gallup Historical Trends," https://ilearn.marist.edu/access/content/attachment/0716626b-ff2a-4223-8f8e-27bbdc4596ad/Forums/36d7b66f-42b1-47f2-b1d9-5453a81dfd00/Marriage%20_%20Gallup%20Historical%20Trends.pdf.

⁴¹ "Obergefell v. Hodges," IIT Chicago-Kent College of Law, accessed December 14, 2015, <https://www.oyez.org/cases/2014/14-556>.

claims 5 to 4, toppling the rest of the Defense of Marriage Act that had been in effect since 1996 during President Clinton's administration.⁴² Justice Anthony Kennedy penned the Court's majority opinion, which reflected the general population's current majority opinion that marriage, regardless of the sex of the couple, is a right. As MSNBC reporter Emma Margolin pointed out, Kennedy used the word "dignity" nine times in the 34-page opinion.⁴³ He recognized that the request for universal recognition of gay marriages was actually fairly conservative, writing, "no union is more profound than marriage, for it embodies the highest ideals of love, fidelity, devotion, sacrifice, and family." He continued, "It would misunderstand these men and women to say they disrespect the idea of marriage. Their plea is that they do respect it, respect it so deeply that they seek to find its fulfillment for themselves."⁴⁴

In the big picture, what caused this relatively quick, dramatic shift in public opinion to a majority favoring gay marriage? No singular event, court case, or public policy was fully responsible; rather it was any event that made the LGBT population more visible and therefore more widely understood and tolerated, beginning with the AIDS crisis and extending to legal and non-legal actions that proceeded in a snowballing effect. It gave LGBT people a continuous way to assert their identity and keep gay rights, including gay marriage, in the news and in people's minds. Based on trends over the past 35 years and the recent landmark decision of *Obergefell v. Hodges*, it is likely that acceptance and encouragement of gay marriage will continue to climb at a steady pace until it becomes a complete non-issue. In the words of a recent Wonder Woman comic that reflects what is now majority opinion, "It's not gay marriage. It's just marriage".⁴⁵

⁴² "Timeline," PBS, <http://www.pbs.org/wgbh/americanexperience/features/timeline/stonewall/>.

⁴³ Emma Margolin, "Supreme Court rules in favor of marriage equality," June 26, 2015, accessed December 15, 2014, <http://www.msnbc.com/msnbc/supreme-court-rules-favor-marriage-equality>.

⁴⁴ *Obergefell v. Hodges* 576 US (2015), accessed December 14, 2015, <https://www.oyez.org/cases/2014/14-556>.

⁴⁵ Drew Mackie, "Wonder Woman: 'It's Not Gay Marriage. It's Just Marriage'," Frontiers Media, August 21, 2015, accessed December 14, 2015. <https://www.frontiersmedia.com/frontiers-blog/2015/08/21/wonder-woman-its-not-gay-marriage-its-just-marriage/>

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