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Beyond Our Hearts: The Ecology of Couple Relationships

Holning Lau*

In 1921, Leonard Rhinelander and Alice Jones began a romance that eventually captivated “curious spectators”¹ and inspired a Hollywood film.² Their relationship has now also inspired a book by law professor Angela Onwuachi-Willig. The New York couple’s tale stirs audiences not only because they were in an interracial marriage at a time when interracial nuptials were extremely rare and, in many parts of the country, illegal.³ The love story is also rousing because of its tragic demise.

According to scholars who have studied the Rhinelander romance, Leonard’s white aristocratic family never accepted Alice, a light-skinned woman who carried “colored blood” in her veins.⁴ Twenty-one-year-old Leonard bent under his father’s pressure and filed a lawsuit to annul his marriage.⁵ He argued that he was unaware that Alice carried colored blood and, had he known, he never would have married her.⁶ Leonard contended that his

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1. ANGELA ONWUACHI-WILLIG, ACCORDING TO OUR HEARTS: *RHINELANDER V. RHINELANDER* AND THE LAW OF THE MULTIRACIAL FAMILY 29 (2013).

2. The couple’s annulment lawsuit inspired the 1959 film *Night of the Quarter Moon*. See ONWUACHI-WILLIG, *supra* note 1, at 79-80.

3. When Leonard and Alice married in 1924, thirty states had antimiscegenation laws. See *Legal Map*, LOVING DAY, <http://lovingday.org/legal-map> (last visited June 23, 2013).

4. ONWUACHI-WILLIG, *supra* note 1, at 3.

5. *Id.* at 40-117.

6. *Id.*

marriage should therefore be annulled because of racial fraud.⁷ All the while, Leonard harbored hopes that the lawsuit he filed to appease his father would fail, and that he and Alice could put the legal battle behind them and resume their love affair.⁸

Alice's attorney countered that Leonard always knew Alice's racial background, and their marriage was therefore valid.⁹ After an extraordinary trial—which included Alice disrobing before an all-male, all-white jury to prove the obviousness of her race—Alice prevailed in court.¹⁰ She and Leonard, however, both suffered love lost. Perhaps unsurprisingly, the lawsuit strained their relationship beyond repair. They could not divorce in New York due to the state's restrictive divorce laws at the time, so they traveled to Nevada to get a divorce under that state's liberal divorce regime.¹¹ Leonard eventually passed away at the young age of thirty-four.¹² Alice lived until 1989, never having remarried. She was buried with a headstone that bears her marital name, "Alice J. Rhinelander," which Professor Onwuachi-Willig interprets as a sign of Alice's continued affection for Leonard.¹³

In her engaging book, *According to Our Hearts: Rhinelander v. Rhinelander and the Law of the Multiracial Family*, Professor Onwuachi-Willig provides fresh insights into the Rhinelander litigation and its social significance by examining the case's trial transcript, court documents, and archived newspaper articles covering the legal battle.¹⁴ While the first half of the book focuses closely on the *Rhinelander* case, the second half shifts focus to contemporary interracial couples, particularly black-white couples. Although the social climate has improved dramatically, Professor Onwuachi-Willig persuasively demonstrates that interracial couples continue to face substantial prejudices.

In this essay, I seek to make more explicit and elaborate on a point that emerges from *According to Our Hearts*. The point is that our hearts are often not enough for developing and sustaining loving relationships. Rather, ecological factors influence whether a union between two people will thrive. In the case of the Rhinelanders, for example, social stigma and Leonard's unaccepting family contributed to their relationship's demise.

In the remainder of this essay, I explore what *According to Our Hearts* tells us about the ways in which ecology affects relationships. Additionally, I contend that a greater appreciation of ecological factors ought to inform public policy discussions, including conversations about same-sex marriage and

7. *Id.*

8. *Id.* at 38.

9. *Id.* at 40-117.

10. *Id.*

11. *Id.* at 4, 149.

12. *Id.* at 102.

13. *Id.* at 103-04.

14. *Id.* at 6.

evaluations of federally funded marriage promotion programs. Commentators in these discussions sometimes forget that relationship stability depends not only on the couple at issue, but also on the environment in which the couple exists. With its compelling personal narratives, *According to Our Hearts* reminds us not to make that mistake.

I.

ECOLOGY MATTERS

According to Our Heart uses personal narratives to convey the lived experiences of interracial couples. Professor Onwuachi-Willig does not stop at telling the Rhinelanders' tale. She also shares stories from twenty-one black-white couples whom she interviewed for the book, from plaintiffs in antidiscrimination lawsuits, and from her own experience as a black woman married to a white man.¹⁵

These stories vividly illustrate ways in which couple relationships are influenced by the environmental context in which they exist.¹⁶ Family and friends play an important role in shaping that context. In the extreme case of the Rhinelanders, Leonard's family actively sought to separate the young couple. During their courtship, Leonard's father physically separated the two by sending Leonard away from New York, first on extended chaperoned trips and then as a student at a school in Arizona.¹⁷ Still, Leonard and Alice sustained their romance through letter-writing. Alice alone wrote 426 letters to Leonard during this time.¹⁸ Leonard eventually returned to New York and married Alice, but his father convinced him shortly afterwards to file for annulment.¹⁹

While the Rhinelander example is extreme, a number of the contemporary interracial couples interviewed in *According to Our Hearts* also faced opposition from family and friends.²⁰ The disapproval ranged from verbal put-downs to a father refusing to attend his daughter's interracial marriage.²¹ Professor Onwuachi-Willig also cites research to conclude that some individuals hide their interracial relationships from family and friends in order to avoid potentially uncomfortable situations.²²

When family and friends are unaccepting of a couple's relationship, the couple is denied social support that could otherwise strengthen and stabilize the

15. The twenty-one couples that constituted Professor Onwuachi-Willig's survey sample included sixteen different-sex couples and five same-sex couples. *Id.* at 8.

16. For an elaboration on how ecological conditions impact couple relationships, see Ted L. Huston, *The Social Ecology of Marriage and Other Intimate Unions*, 62 J. MARRIAGE & FAM. 298 (2000).

17. ONWUACHI-WILLIG, *supra* note 1, at 28-29.

18. *Id.* at 29.

19. *Id.* at 30-31.

20. *E.g.*, *id.* at 210-11, 243-48.

21. *E.g.*, *id.*

22. *Id.* at 206

relationship. Indeed, social science research suggests that social support is a predictor of relationship stability among couples.²³ Family and friends can offer emotional support by recognizing and affirming the couple as an entity. They can also be emotionally available to a couple, helping them to work through trying times. Likewise, family and friends can provide instrumental support. For example, parents with financial means can invest in their children's marriages by helping the couple to make purchases related to starting a home together. Research shows that financial hardship stresses relationships and increases the risk of relationship dissolution.²⁴ Material support from family and friends can help to ameliorate that risk.

When a couple is not accepted by either partner's family, the couple is not only denied social support, but also opportunities to be there for each other on important occasions. For example, a couple that keeps their relationship secret to avoid family conflict would have difficulty seeing each other both in trying times and on celebrations. Should one partner suffer a medical emergency, his or her partner may not be able to visit at the hospital due to fear of running into the hospitalized partner's family. To avoid conflict, the couple may also need to separate and spend holidays with their respective families of origin. Not being able to be there for each other during these life moments limits the ability of some couples to deepen their emotional bonds.

Beyond family and friends, other ecological factors influence couple relationships as well. In *According to Our Hearts*, Professor Onwuachi-Willig examines cases of discrimination, harassment, and microaggression against interracial couples.²⁵ These indignities range from fielding strangers' belittling remarks to being targets of physical assaults.²⁶ Couples do not only suffer harm when they are forced to confront discrimination directly. They are also burdened by the work they undertake to avoid discrimination. For example, several black-white couples in the book—including Professor Onwuachi-Willig and her husband—talked about carefully planning family trips to avoid venues on the road that might be uncomfortable for interracial couples and their children.²⁷

According to Our Hearts illustrates that being in a black-white relationship can burden individuals in ways that are irrelevant to monoracial

23. For information on the relationship between social support and relationship stability, see Robert M. Milardo & Heather Helms-Erikson, *Network Overlap and Third-Party Influence in Close Relationships*, in *CLOSE RELATIONSHIPS: A SOURCEBOOK* 33-45 (Clyde Hendrick & Susan S. Hendrick eds., 2000); Susan Sprecher & Diane Felmlee, *The Influence of Parents and Friends on the Quality and Stability of Romantic Relationships: A Three-Wave Longitudinal Investigation*, 54 *J. MARRIAGE & FAM.* 888-90 (1992).

24. See Lynn White & Stacy J. Rogers, *Economic Circumstances and Family Outcomes: A Review of the 1990s*, 62 *J. MARRIAGE & FAM.* 1035, 1042-45 (2000) (reviewing research on economic hardship's relationship to marital stability and marital quality).

25. ONWUACHI-WILLIG, *supra* note 1, at 161-267.

26. *Id.*

27. *Id.* at 172-73.

couples. This creates “an incentive for deciding against black-white intimate relationships and, ultimately, black-white marriage or commitment.”²⁸ Further, individuals that transgress the norm of monoracial coupling might “actually end their relationships when they feel the costs of their transgressions have become too high.”²⁹ To be sure, a good number of interracial couples are resilient. For example, all the couples that Professor Onwuachi-Willig interviewed are still together. Many other black-white couples, however, have parted ways just as the Rhinelanders did, due to ecological factors that weigh on interracial couples.³⁰

II.

FACTORING IN ECOLOGY

According to Our Hearts provides a helpful reminder that ecological factors impact the relationships of couples. This reminder should inform public policy discussions beyond those that the book explicitly addressed. In this section, I examine how considerations of ecology ought to inform debates about same-sex marriage, as well as debates about the federally funded Healthy Marriage Initiatives. I take insights from *According to Our Hearts* and apply them to these two public policy areas.

A. Same-Sex Marriage

Opponents of same-sex marriage have argued that same-sex couples are unsuitable for marriage because their relationships are unnatural and thus inherently unstable. Legal scholars such as Professors Lynn Wardle and George Dent have repeated this claim.³¹ The National Organization for Marriage, a group at the forefront of the campaign against same-sex marriage, has also made this argument.³²

28. *Id.* at 156.

29. *Id.* at 157.

30. Empirical research on the dissolution rate of interracial relationships is still nascent and somewhat inconsistent. The available data tend to show that interracial couples are more likely than monoracial couples to end their relationships. See Linda M. Burton et al., *Critical Race Theories, Colorism, and the Decade's Research on Families of Color*, 72 J. MARRIAGE & FAM. 440, 451 (2010) (reviewing empirical studies).

31. George W. Dent, Jr., *No Difference? An Analysis of Same-Sex Parenting*, 10 AVE MARIA L. REV. 53, 61-63 (2011); Lynn D. Wardle, *A Response to the 'Conservative Case' for Same-Sex Marriage: Same-Sex Marriage and 'The Tragedy of the Commons'*, 22 B.Y.U. J. PUB. L. 441, 453-56 (2008); Lynn D. Wardle, *The Attack on Marriage as the Union of a Man and a Woman*, 83 N.D. L. REV. 1365, 1375 (2007).

32. For example, the website of the Ruth Institute, a division of the National Organization for Marriage, advocates banning same-sex marriage by asking readers: “What types of unions have the highest rates of divorce?” The website then tells readers that same-sex couples are less stable than different-sex couples. See *Marriage Quiz*, RUTH INSTITUTE, <http://www.ruthinstitute.org/pages/marriageQuiz.html> (last visited June 23, 2014). To support its claim, the Ruth Institute cites statistics from California, the Netherlands, Norway, and Sweden. I discuss below why this use of data is problematic. See *infra* notes 35-47 and accompanying text.

This claim is problematic on more than one front. In this essay, I focus on the claim's factual weakness. However, it is also worth noting that the claim is logically inconsistent with other arguments against same-sex marriage. Indeed, argumentation against same-sex marriage has become schizophrenic. On the one hand, some opponents of marriage equality argue that same-sex couples are inherently unstable, and thus unfit for marriage.³³ On the other hand, other opponents argue that different-sex parents are *more* unstable than same-sex parents and are therefore uniquely in need of the stabilizing force that marriage provides.³⁴ While this inconsistency is troubling, I focus my remarks on the flawed factual basis of claims about same-sex relationships being inherently unstable.

Opponents of same-sex marriage sometimes cite statistics to show that same-sex unions tend not to last as long as their different-sex counterparts.³⁵ *According to Our Hearts*, however, casts doubt on whether statistics about dissolution rates say anything meaningful about the inherent nature of same-sex relationships because it reminds us that higher dissolution rates may very well result from ecological factors, such as prejudices against same-sex unions.

Covering: The Hidden Assault on Our Civil Rights, by Professor Kenji Yoshino, helps illustrate this point.³⁶ Like *According to Our Hearts*, Professor Yoshino's book is part memoir and part legal analysis. Professor Yoshino recounts his first relationship with another man.³⁷ Although his heart was in the relationship, he hid it from his parents and his law school friends, fearing their disapproval.³⁸ Social prejudices also prevented Professor Yoshino from supporting his boyfriend at critical junctures of their relationship. For example, when his boyfriend was at the hospital for a serious medical diagnosis, he reached for Professor Yoshino's hand for comfort, but Professor Yoshino brushed it away to avoid being visibly gay.³⁹ Moments like this limit a couple's ability to nurture each other and cultivate their union. According to Professor Yoshino, he and his boyfriend's eventual breakup was "specifically gay"

33. See *supra* notes 31-32 and accompanying text.

34. The argument is that, unlike same-sex couples, different-sex couples can accidentally procreate, and unplanned children destabilize relationships. See Courtney G. Joslin, *Searching for Harm: Same-Sex Marriage and the Well-Being of Children*, 46 HARV. C.R.-C.L. L. REV. 81, 88-90 (2011) (summarizing the development of the "accidental-procreation theory"); see also *Hernandez v. Robles*, 855 N.E.2d 1 (N.Y. 2006):

The Legislature could find that unstable relationships between people of the opposite sex present a greater danger that children will be born into or grow up in unstable homes than is the case with same-sex couples, and thus that promoting stability in opposite-sex relationships will help children more. This is one reason why the Legislature could rationally offer the benefits of marriage to opposite-sex couples only.

35. E.g., Dent, *supra* note 31, at 61-63; Wardle, *A Response to the 'Conservative Case'*, *supra* note 31, at 453-56; Wardle, *The Attack on Marriage*, *supra* note 31, at 1375; RUTH INSTITUTE, *supra* note 32.

36. KENJI YOSHINO, *COVERING: THE HIDDEN ASSAULT ON OUR CIVIL RIGHTS* (2006).

37. *Id.* at 74-76, 89-91.

38. *Id.*

39. *Id.* at 91.

because he gave up on the relationship more easily than he would have if his partner had been a woman.⁴⁰ He ended up choosing to focus on his career instead of his love life because “[t]he relationship was stigmatized, and mostly a secret.”⁴¹ Social prejudices weighed heavily on Professor Yoshino, precipitating the end of his relationship. Beyond the social pressures experienced by Professor Yoshino, there are many additional ecological factors that influence the stability of same-sex relationships, including the denial of marriage rights that could help to solidify some same-sex unions.⁴²

Commentators who claim that same-sex couples are inherently unstable sometimes point to statistics from the Netherlands, the first country to legalize same-sex marriage.⁴³ Dutch statistics showing that same-sex couples have had higher dissolution rates than different-sex couples are touted as evidence that same-sex couples are somehow inherently unstable.⁴⁴ Commentators claim that the higher dissolution rates cannot be caused by anti-gay prejudices because the Netherlands has been a leader in reforming laws to protect gay rights, which is a sign of social acceptance.⁴⁵ *According to Our Hearts*, however, reminds us that formal legal equality does not eradicate social prejudices. Even though the Rhinelanders could legally marry in New York, they still faced social disapproval of interracial love. The contemporary black-white couples in *According to Our Hearts* still grapple with challenges, even though the Supreme Court declared antimiscegenation laws unconstitutional almost a half-century ago.⁴⁶ Similarly, the Netherlands is still home to prejudices against same-sex relationships, as evidenced by the troubling number of hate crimes there that occur based on sexual orientation.⁴⁷

B. *Healthy Marriage Initiatives*

Beyond same-sex marriage, *According to Our Hearts* also reminds us to be mindful of ecological factors when considering the soundness of the government’s marriage promotion policies. The George W. Bush administration began funding Healthy Marriage Initiatives, programs that President Barack Obama’s administration continues.⁴⁸ Under these initiatives,

40. *Id.* at 89.

41. *Id.*

42. See Holning Lau & Charles Q. Strohm, *The Effects of Legally Recognizing Same-Sex Unions on Health and Well-Being*, 29 J. L. & INEQUALITY 107, 117-41 (2011) (summarizing empirical research suggesting that same-sex couples tend to feel more committed to each other after formalizing their relationships through marriage or other forms of legal recognition).

43. *E.g.*, Wardle, *A Response to the ‘Conservative Case’*, *supra* note 31, at 454-55.

44. *Id.*

45. *E.g., id.*

46. See *Loving v. Virginia*, 388 U.S. 1, 12 (1967) (holding that Virginia’s antimiscegenation law violated constitutional protections of equal protection and due process).

47. Laurens Buijs, Gert Hekma & Jan Willem Duyvendak, *‘As Long as They Keep Away from Me’: The Paradox of Antigay Violence in a Gay-friendly Country*, 14 *SEXUALITIES* 632 (2011).

48. Matthew D. Johnson, *Healthy Marriage Initiatives: On the Need for Empiricism in Policy Implementation*, 67 *AM. PSYCH.* 296, 298-99 (2012).

the federal government provides grants to organizations that use the funds to promote healthy marriages.⁴⁹ Most of the money allocated to these programs is used to encourage couples to get married and stay married, by training couples on relationship skills and extolling the benefits of marriage.⁵⁰ *According to Our Hearts* should lead us to question how efficacious marriage promotion programs can be without addressing ecological factors contributing to a relationship's stability.

By and large, the Healthy Marriage Initiatives have targeted low-income individuals because marriage rates have been particularly low in poor communities.⁵¹ Commentators, including Professor Onwuachi-Willig, have expressed doubt about the extent to which increasing marriage rates in low-income communities is a worthwhile governmental goal.⁵² Yet, even if we assume that increasing marriage rates is a laudable aim, we should question whether programs that focus on educating couples have the power to produce stable marriages.

Research shows that low-income communities do not value the institution of marriage any less than other communities, so low marriage rates in low-income communities do not seem attributable to disinterest in marriage.⁵³ Research also shows that stressful events, including financial hardship, strain couple relationships.⁵⁴ While equipping couples with relationship skills might help them to weather difficult circumstances, commentators have expressed skepticism about the magnitude of difference that relationship training can achieve.⁵⁵ Indeed, recent data on the outcomes of Healthy Marriage Initiatives have been disappointing, suggesting that the programs have had little to no effect on low-income couples' relationship stability.⁵⁶ The data support the

49. For a list of 2013 grantees, see *Healthy Marriage and Responsible Fatherhood Grantees*, U.S. DEPT. OF HEALTH & HUM. SVCS., <http://www.acf.hhs.gov/programs/ofa/resource/healthy-marriage-grantees> (last visited July 25, 2013).

50. Johnson, *supra* note 48, at 299; Vivian Hamilton, *Will Marriage Promotion Work?*, 11 J. GENDER RACE & JUST. 1, 11 (2007).

51. Johnson, *supra* note 48, at 196-99; Hamilton *supra* note 50, at 2-3.

52. See Angela Onwuachi-Willig, *The Return of the Ring: Welfare Reform's Marriage Cure as the Revival of Post-bellum Control*, 93 CALIF. L. REV. 1647, 1682-95 (2005) (questioning whether it makes sense to make marriage promotion a priority of the government's anti-poverty campaign). In previous writing, I have expressed concerns that some marriage promotion policies could lead people to enter into, and stay in, unhealthy relationships. See Lau & Strohm, *supra* note 42, at 147.

53. For summaries of research about low-income individuals' interest in marriage, see Hamilton, *supra* note 50, at 6-8; Ted Huston & Heidi Melz, *The Case for (Promoting) Marriage: The Devil Is in the Details*, 66 J. MARRIAGE & FAM. 943, 947 (2004).

54. See Johnson, *supra* note 48, at 301-02 (discussing research on the impact of stressful events on relationships); White & Rogers, *supra* note 24, at 1042-45 (reviewing research on economic hardship and marriages).

55. E.g., Hamilton, *supra* note 50, at 12-14; Huston & Melz, *supra* note 53, at 955-56.

56. Johnson, *supra* note 48, at 299-300 provides a helpful review of empirical studies on the Healthy Marriages Initiatives' effectiveness. Updated data from the Building Strong Families Project, one of the Healthy Marriages Initiatives, became available after Johnson published his review. The updated data are consistent with Johnson's finding that the Healthy Marriages Initiatives have been ineffective. "After three years, BSF [the Building Strong Families Project] had no effect on the quality

belief that fostering goodwill between a couple, without addressing ecological factors that burden their relationship, is inadequate.⁵⁷ Thus, taking funds from the Healthy Marriage Initiatives and putting them towards economic development, job training, and other investments in human capital might do more to stabilize couple relationships.⁵⁸

We should carefully consider the significance of ecological influences when we discuss public policy options such as marriage promotion programs. *According to Our Hearts* enriches policy conversations by vividly illustrating that people's desires for couple relationships are often not enough to sustain relationships and, accordingly, ecology matters. To be sure, financial hardship is a very different ecological condition than the racial prejudices described by Professor Onwuachi-Willig. Nonetheless, her book's lessons about our hearts' limitations can be applied to contexts beyond the racial dynamics that were the book's focus.⁵⁹ This is one of the many reasons why readers will find *According to Our Hearts* illuminating.

CONCLUSION

In her engrossing new book *According to Our Hearts*, Professor Onwuachi-Willig uses the story of Leonard and Alice Rhinelander as a launching pad for exploring the topic of interracial coupling. Professor Onwuachi-Willig demonstrates that prejudices against interracial couples and multiracial families continue to manifest in law and in social interactions. These prejudices sometimes make it difficult for interracial couples to sustain their relationships. Leonard and Alice Rhinelander, for example, ultimately parted ways.

Professor Onwuachi-Willig's account of interracial coupling puts in stark relief the fact that relationships are impacted by the environments in which they exist. In this essay, I have sought to take this insight and apply it to public policy discussions beyond the focus of Professor Onwuachi-Willig's book.

of couples' relationships and did not make couples more likely to stay together or get married." ROBERT G. WOOD, THE LONG-TERM EFFECTS OF BUILDING STRONG FAMILIES: A RELATIONSHIP SKILLS EDUCATION PROGRAM FOR UNMARRIED PARENTS (2012), available at <http://www.acf.hhs.gov/programs/opre/resource/the-building-strong-families-project-the-long-term-effects-of-building>.

57. For the view that marriage promotion programs fail to address ecological conditions sufficiently, see Hamilton, *supra* note 50, at 12-14; see also Huston & Melz, *supra* note 53, at 955-56.

58. See Huston & Melz, *supra* note 53, at 955-56 (arguing that the strengthening of families will require "economic development and investments in human capital"). It is beyond the scope of this essay to discuss comprehensively whether marriage programs targeting low-income communities should be reformed or abolished altogether. For a proposal to reform the Healthy Marriage Initiatives, see, for example, Johnson, *supra* note 48, at 304-05. For a thoughtful book that explores many ways that the government can provide support to families, including support to couple relationships, see MAXINE EICHNER, THE SUPPORTIVE STATE: FAMILIES, GOVERNMENT, AND AMERICA'S POLITICAL IDEALS (2010).

59. Of course, race intersects with sexual orientation and class, two contexts that this essay has discussed. Thus, a black-white couple that contends with racial prejudice might also face anti-gay prejudice as well as difficulties that stem from economic hardship.

Specifically, I examined contemporary debates over same-sex marriage and the federal government's Healthy Marriage Initiatives. Too often, commentators in these debates fail to recognize that ecological conditions influence the relationships at issue. *According to Our Hearts* provides a helpful reminder not to commit that error.