LGBT EQUALITY AND SEXUAL RACISM

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INTRODUCTION

We want to use the fiftieth anniversary of Loving v. Virginia1 to juxtapose the public legal posture of LGBT litigants with the private practices of racial discrimination in intimate relationships, or “sexual racism.”2 In arguing for marriage equality, LGBT litigants and groups successfully relied on the U.S. Supreme Court’s Loving decision for its recognition of the right to marry as fundamental and the Court’s refusal to defer to a history of discrimination.3 Indeed, Obergefell v. Hodges4 cited Loving eight times to justify extending the right to marry.s

Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission,6 which is pending before the Court as this Article goes to press, represents another moment in which the LGBT rights movement is turning to race in order to

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1. 388 U.S. 1 (1967).
2. Scholars have used various terms to refer to discrimination in sexual and romantic relationships. Legal scholars have used terms such as “romantic segregation” and “intimate discrimination.” See, e.g., Elizabeth F. Emens, Intimate Discrimination: The State’s Role in the Accidents of Sex and Love, 122 HARV. L. REV. 1307, 1307–08 (2009); Russell K. Robinson, Structural Dimensions of Romantic Preferences, 76 FORDHAM L. REV. 2787, 2802–03 (2008). In recent years, the term “sexual racism” has gained traction globally. See, e.g., Denton Callander et al., Is Sexual Racism Really Racism?: Distinguishing Attitudes Toward Sexual Racism and Generic Racism Among Gay and Bisexual Men, 44 ARCHIVES SEXUAL BEHAV. 1991, 1991 (2015).
5. Id. at 2598–604.
advance its goals. In a line of key precedents from the 1960s to the 1980s, the Court rejected litigants’ requests for First Amendment-based exemptions from antidiscrimination laws that protected people of color and women. The Court dismissed such defenses in a brusque and occasionally derisive manner. Yet the Court has seriously engaged First Amendment claims when LGBT rights are at stake, and in two of the three key cases, it vindicated the First Amendment claim. This contrast sets up another instance in which LGBT rights may very well depend on whether LGBT advocates can lay claim to prior victories by people of color and women.

The Colorado Civil Rights Division brought suit against Masterpiece Cakeshop after its owner refused to make a cake for Charlie Craig and David Mullins’s wedding reception. Jack Phillips, the owner, argued that his religious beliefs, his artistic freedom as a baker, and Colorado’s failure to recognize same-sex marriage entitled him to an exemption from the Colorado antidiscrimination statute. Colorado courts rejected Phillips’s defenses, and he appealed to the Supreme Court. Craig and Mullins, who are both white men, responded with a brief that links their case to Loving and other

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7. See generally Damien W. Riggs, Introduction: Towards a Typology of Racisms in Gay Men’s Communities, in THE PSYCHIC LIFE OF RACISM IN GAY MEN’S COMMUNITIES, at ix, x (Damien W. Riggs ed., 2017) (arguing that a “narrative of ‘homo-innocence’ ... allows white middle-class gay men to ignore” their complicity in racism and “make recourse to analogies between race and sexuality in order to make rights claims about the latter”).


10. Compare Boy Scouts of Am. v. Dale, 530 U.S. 640, 644 (2000) (finding that New Jersey’s public accommodations law, which required the Boy Scouts to maintain the membership of “an avowed homosexual and gay rights activist,” violated the group’s “First Amendment right of expressive association”), and Hurley v. Irish-Am. Gay, Lesbian & Bisexual Grp. of Bos., Inc., 515 U.S. 557, 559 (1995) (holding that “Massachusetts may [not] require private citizens who organize a parade to include among the marchers a group imparting a message the organizers do not wish to convey”), with Christian Legal Soc’y v. Martinez, 561 U.S. 661, 668–69 (2010) (finding that a public law school’s policy of “condition[ing] its official recognition of a student group ... on the organization’s agreement to open eligibility for membership and leadership to all students” was a “reasonable, viewpoint-neutral condition on access” that did not violate the First Amendment). Additionally, in Rumsfeld v. Forum for Academic & Institutional Rights, Inc., 547 U.S. 47 (2006), the Court concluded that the Solomon Amendment, which withheld funds from colleges that restricted military recruiters’ access, did not violate the First Amendment, even where the exclusion was to protest the military’s “Don’t Ask, Don’t Tell” policy, id. at 70. For a thoughtful discussion of how the First Amendment has advanced LGBT rights in other contexts, see generally Scott Skinner-Thompson, The First Queer Right, 116 MICH. L. REV. (forthcoming 2018).


12. Id.

protections for racial and religious minorities. For example, the brief asserts:

If the First Amendment bars a state from applying an anti-discrimination law to the sale of wedding cakes because they involve artistry, then bakeries could refuse to provide cakes for an interracial or interfaith couple’s wedding, a Jewish boy’s bar mitzvah, an African-American child’s birthday, or a woman’s business school graduation party.

At oral argument, the Justices quizzed the lawyers as to whether race discrimination precedents necessarily extend to sexual orientation and other forms of bias.

Bigots such as the trial judge in *Loving* have long invoked religion to justify discrimination. We agree with Mullins and Craig that neither religion nor artistic freedom justifies letting businesses discriminate. However, we also want to make manifest the tension between the public posture of LGBT-rights litigants and the practices of some LGBT people who discriminate based on race in selecting partners. We argue that some white people’s aversion to dating and forming relationships with people of color is a form of racism, and this sexual racism is inconsistent with the spirit of *Loving*. Part I provides a review of empirical literature on the prevalence of racial preferences in intimate relationships and shows that racial preferences are particularly pronounced among gay men. Part II supplements this overview with a qualitative exploration of how race informed the intimate experiences of people who sat for interviews as part of our ongoing study, LGBT Relationships and Well-Being. We also offer a theory that may partially explain sexual racism in the LGBT community. Specifically, exposure to mainstream gay culture may teach sexual minority men that race and desire are closely intertwined. In Part III, we propose ideas for further research, including a study that would test our theory.

**I. EMPIRICAL EVIDENCE OF RACIAL PREFERENCES**

Understanding racial preferences within the LGBT community is a tricky issue to navigate because interracial relationships are more common among
sexual minorities than heterosexuals. An analysis of U.S. census data demonstrates that 20.6 percent of same-sex couples are interracial, compared to 18.3 percent of unmarried heterosexuals and 9.5 percent of married heterosexuals. Potential explanations for these differences include the possibility that sexual minorities are more progressive than heterosexuals. Prominent white LGBT people have described their experiences as sexual minorities as fostering greater empathy for other stigmatized groups. Some empirical work has sought to test the “minority solidarity assumption”—the assumption that one’s status as a sexual minority should make him or her more tolerant of other minorities. Other explanations, however, suggest that same-sex couples are more likely to be interracial because of a restricted pool of potential partners relative to heterosexuals, who are in the overwhelming numeric majority. LGBT-identified people make up about 3.5 percent of the U.S. population, “a figure roughly equivalent to the population of New Jersey.” These demographic constraints may be a more powerful explanation for the greater integration of LGBT couples than a heightened openness to partners of other races.

A small but growing body of research has demonstrated the existence of sexual racism, especially within gay and bisexual men’s experiences of dating and online partner seeking. “Sexual racism” has been defined as “a specific form of racial prejudice enacted in the context of sex and dating.”


20. GATES, supra note 19.

21. Consider Apple CEO Tim Cook. Cook invoked Dr. Martin Luther King, Jr. as an inspiration to come out and stated: “Being gay has given me a deeper understanding of what it means to be in the minority and provided a window into the challenges that people in other minority groups deal with every day. It’s made me more empathetic, which has led to a richer life.” Tim Cook, Tim Cook Speaks Up, BLOOMBERG (Oct. 30, 2014, 4:16 PM), https://www.bloomberg.com/news/articles/2014-10-30/tim-cook-speaks-up [https://perma.cc/467C-RGM8]; see also PATRICK J. EGAN ET AL., FINDINGS FROM THE HUNTER COLLEGE POLL OF LESBIANS, GAYS AND BISEXUALS: NEW DISCOVERIES ABOUT IDENTITY, POLITICAL ATTITUDES, AND CIVIC ENGAGEMENT 21–22 (2008).


25. See, e.g., Denton Callander et al., ‘Not Everyone’s Gonna Like Me’: Accounting for Race and Racism in Sex and Dating Web Services for Gay and Bisexual Men, 16 ETHNICITIES 3, 4 (2016); Matthew Rafalow et al., Racialized Femininity and Masculinity in the Preferences of Online Same-Sex Daters, 4 SOC. CURRENTS 306, 306 (2017); Robinson, supra note 2, at 2799–800, 2808–19.

26. Callander et al., supra note 25, at 3. We use “racial preferences” to describe all predispositions for a particular race, and “sexual racism” to focus on a subset of preferences that are driven by prejudice. We treat racial preferences as presumptively suspect, but we do
As an example of sexual racism, consider the theme on the male hookup app Grindr of comparing men of color to food. Asian men are “rice,” blacks are “chocolate,” and Latinos are “spice.” According to this objectifying logic, a preference for or against a particular race is no more significant or harmful than favoring vanilla ice cream over chocolate.

Studies of gay men have indicated that men in online dating and sexual partner seeking contexts express desire for white and Latino partners more frequently than black and Asian-identified men. One challenge to studying sexual racism is that, although men who seek partners online appear to be more vocal about their racial preferences than people interacting offline, studies suggest that most white men, irrespective of sexuality, do not state racial preferences. A further complication is that some studies suggest that men of color may be more likely than whites to mention race in their profiles. However, this does not mean that most white men lack racial preferences relative to men of color. Because the majority of potential partners are white, white men may have the luxury of not thinking about race when they write their profiles. Men of color, by contrast, may be more cognizant of how race may impinge their romantic opportunities and thus directly address race. In a study by Voon Chin Phua and Gayle Kaufman, black men were the most likely to mention race inclusively and in nondiscriminatory ways (e.g., “all races welcome”). Overall, Phua and Kaufman conclude that their data indicate that minorities’ racial preferences correspond to the “racial hierarchy.” “Most advertisers prefer either their own race or Whites, and [non-blacks] least prefer Blacks, regardless of sexual orientation.”

not extend that presumption to sex-based preferences, such as a man who prefers men. Our concern with racial preferences is that they may perpetuate racial subordination by, among other things, limiting relationship possibilities for people of color. In our view, gay men, who make up about 1 percent of the population, see Gates, supra note 24, at 1, do not contribute to patriarchy simply by refusing to date women. We plan to engage sex- and gender-based preferences within the LGBT community more fully in future work arising from the LGBT Relationships and Well-Being study.

29. Voon Chin Phua & Gayle Kaufman, The Crossroads of Race and Sexuality: Date Selection Among Men in Internet “Personal” Ads, 24 J. FAM. ISSUES 981, 988–89, 991 (2003); Robinson, supra note 2, at 2811–12. Some apps and websites allow users to filter profiles to show only people of a particular race. See Emens, supra note 2, at 1322. Thus, even someone who does not mention race in his profile might use race to screen profiles.
32. See Phua & Kaufman, supra note 29, at 984.
33. Id. at 991.
34. Id.
Some studies have directly examined online interactions between people of different races to avoid the limitations of relying on profile text as evidence of racial preferences. Further, some of these studies broaden the frame to compare racial preferences among people of various sexual orientations. Jennifer Lundquist and Ken-Hou Lin’s comparative study of white same-sex and different-sex daters examined user data from one of the most widely used dating websites. They analyzed dyadic interactions in daters sending and responding to messages from other users of the same or different race or ethnicity. They found that male same-sex daters were less likely to send and respond to messages from users of other races or ethnicities than female same-sex daters and male different-sex daters (but not female different-sex daters). This study confirms previous findings from research demonstrating that although gay men and lesbians are more likely to report willingness to date someone of a different race or ethnicity than heterosexuals, this difference may be mainly driven by a higher willingness to date someone of a different race or ethnicity among lesbians than gay men. In the Phua and Kaufman study, white gay men were nearly five times as likely as straight men to state that they would date only white men. Further, 3 percent of straight Asian men said they would date “Whites only” compared to 31 percent of gay Asian men. Five percent of straight black men said “Whites only,” compared to 19 percent of gay black men. These findings suggest that something distinctive may be happening in gay male communities—that is, something that does not merely mimic the racial patterns in the broader society. Although as sexual minorities they face constrained options for sexual and romantic partnering, white gay men appear more likely to prefer whiteness than both white heterosexual men and white lesbians. And gay men of color may contribute to this pattern by prioritizing whiteness more than lesbians of color and heterosexual men of color.

When examining within-group variation partnership patterns among same-sex couples, studies have demonstrated high degrees of racial homophily (i.e., relationships where partners share the same race or ethnicity) among whites in same-sex relationships. Using the 2010 U.S. census data, Angeliki Kastanis and Bianca Wilson demonstrated that 79 percent of white individuals in same-sex relationships were partnered with another white person (followed by 54 percent of African American individuals in same-race

35. See, e.g., Callander et al., supra note 30, at 1051.
36. See, e.g., Lundquist & Lin, supra note 23, at 1428–30; Tsunokai et al., supra note 28, at 801–03.
37. Lundquist & Lin, supra note 23, at 1430–32.
38. Id. at 1438.
39. Id. at 1441 (citing Phua & Kaufman, supra note 29).
40. Three percent of white straight men said “Whites only” compared with 14 percent of white gay men. See Phua & Kaufman, supra note 29, at 988.
41. Id.; Tsunokai et al., supra note 28, at 808 (“Consistent with [Phua and Kaufman], our analyses indicate that Asian females and gay males are more willing to date Whites than their heterosexual male counterparts.”).
42. Phua & Kaufman, supra note 29, at 988.
partnerships, 37 percent Latino/a, 20 percent Asian and Pacific Islander, and 12 percent among American Indian and Alaskan Natives). Similar findings have been shown in convenience samples of gay and bisexual men. For example, one study indicated high levels of racial homophily in male same-sex relationships, with white men evidencing the highest rates of racial homophily. Thus, sexual racism may manifest not only in preferences for same-race sexual and dating partners expressed on websites and apps known for hookups and casual dating but also in the formation of committed long-term partnerships, and it may be especially pronounced among white men.

Relatedly, it is important to understand that sexual racism does not exist simply as a categorical exclusion, such as “no blacks or Asians,” but may permeate long-term relationships. For instance, a man of color may be deemed desirable only insofar as he adheres to sexualized racial stereotypes. Studies suggest that gay men of various races use race as a proxy to label a man as a “top” or a “bottom.” Black men are expected to embody the insertive or “top” role (which is associated with masculinity) while Asian men are expected to assume the receptive or “bottom” role (which is regarded as relatively feminine). White men, by contrast, are permitted to assume the role of their choice—top, bottom, or versatile—without being constrained by racial stereotypes. The literature suggests that race and ethnicity function to shrink or expand the scope of one’s sexual liberty. A study of men in New York City found that race did not correlate with sexual position preferences; that is, black men were no more likely to identify as tops than men of other races, and Asian men were no more likely to identify as bottoms.

Despite this disconnect between racial stereotypes and actual sex-role preferences, many people resist thinking of romantic preferences as a social


46. Lick & Johnson, supra note 45, at 1479.

47. Id.

48. Grov et al., supra note 44, at 231–32. This study also found that men of color were not more likely than white men to have a high number of sexual partners or practice unprotected sex. Id. at 229.
justice issue. They tend to think of romance and sexuality as a "personal" issue that is disconnected from broader questions of racial and LGBT justice. Some have tried to minimize sexual racism by comparing a racial preference to a preference for a particular height, body type, or hair color. However, some research has demonstrated associations between sexual racism and general measures of multiculturalism and racial discrimination, thus undermining a benign explanation. Indeed, men of color often report experiencing sexual racism online and in social spaces such as nightclubs and describe this as a source of considerable minority stress. Some report altering the content of their self-portrayals in the shadow of racialized expectations in order to take advantage of, or rebut, sexualized racial stereotypes as they search for suitable potential partners. We explore the individual impact of sexual racism on men of color in the following Part.

II. RACIALIZED "LESSONS IN BEING GAY"

How do gay and bisexual men come to see race as shaping their sexual desire? We begin to elaborate a theory of "lessons in being gay" to unpack the socialization process that perpetuates sexual racism. In Why I Hate Abercrombie & Fitch: Essays on Race and Sexuality, Dwight McBride, a black gay man, recounts how white men repeatedly framed him in racial terms, giving the example of a man at a nightclub who told McBride that he and his friends were "out looking for black guys tonight." McBride lamented how the initial sense of sexual liberation that he experienced in West Hollywood evanesced: "That same gay world was now beginning to teach me some important lessons ... about my value in that world and the ways in which race and racism would have congress in even my most intimate of negotiations within it." During the course of the LGBT Relationships

49. See Jesus Gregorio Smith, "It Can't Possibly Be Racism!": The White Racial Frame and Resistance to Sexual Racism, in The Psychic Life of Racism in Gay Men's Communities, supra note 7, at 105, 105.
50. See, e.g., id.
51. Callander et al., supra note 2, at 1995.
53. Id. at 116, 118.
54. See, e.g., Regina Kunzel, Lessons in Being Gay: Queer Encounters in Gay and Lesbian Prison Activism, 100 Radical Hist. Rev. 11 (2008); Russell K. Robinson, Masculinity as Prison: Sexual Identity, Race, and Incarceration, 99 Calif. L. Rev. 1309, 1314 (2011); Russell K. Robinson & David M. Frost, The Afterlife of Homophobia, 80 Ariz. L. Rev. (forthcoming 2018). We offer this theory as one of what are likely several factors that contribute to racial preferences in the LGBT community. Another question, which requires further study, is whether gay men, and particularly white gay men, are more inclined to seek high social status and assimilation than lesbians. If this is true, the preference for a white partner may represent an effort to retain or obtain as much white male privilege as possible.
56. Id. at 120. See generally Chong-suk Han et al., West Hollywood Is Not That Big on Anything but White People: Constructing "Gay Men of Color," 58 Soc. Q. 721 (2017).
and Well-Being study, for several gay and bisexual men described how sexual racism impinged upon their understanding of their sexual liberty. For example, Kevin is an Asian-American man in his twenties, lives in San Francisco, and self-identifies as a bottom and as more on the feminine end of the gender spectrum. Kevin recounted learning his value in the gay community by perusing ads for casual sex on Craigslist when he was a teenager:

There were like multiple barriers and, like, disparaging/really racist disclaimers that were obstacles for my meeting people initially. Even the title of the ad would say ‘interested in this, not Asians’ [or] . . . ‘not interested in femmes or Asians.’ In order to obviate those barriers, I looked for search terms that were just Asian, and so I would get a lot of people who were only interested in Asians for deplorable reasons . . . assumptions about how I would treat them, how I would service them, how I was just more of a receptacle and my pleasure wasn’t taken into account; I was being used for their [pleasure].

Kevin recalled that the “vast majority” of Craigslist ads either expressed disinterest or a fetishized interest in Asian men. Given these limitations, Kevin hooked up mainly with men who had a fetish for Asians. These experiences troubled him because the men’s homes were often decorated with “Asian paraphernalia,” such as movie posters with Asian themes. They were “props on the set, [and] I kinda felt that I was in alignment with these themes.” Kevin said that these men tended to treat him as a “sperm receptacle.” Their attitude toward him was as follows:

You’re going to turn over and I’m going to f--- you. . . . This is what I’m going to do to you, and you’re going to take it. You’re kinda bottom of the barrel; what I’m going to do to you, you’re going to like it, because you don’t have any other choices.

Recently, Kevin has become more critical of his preference for whiteness and is trying to date men of color as well as white men. In reflecting on his sexual choices, he noted that his family seemed to value his association with white partners. At one point, his mother even warned him not to break up with a wealthy white partner by stating: “Well, at least he’s not black!” Kevin’s story offers a glimpse into how broader social forces from heterosexual people, including one’s family of origin, may intersect with

58. Interview with “Kevin” (Dec. 3, 2016).
59. Id.
60. Id.
61. Id.
62. Id.
63. Id.
64. Id.
65. Id.
66. Id.
67. Id.
racial norms in the gay community to pressure one into certain roles and relationships.\textsuperscript{68}

Wendell, a black New Yorker in his thirties, described more subtle pressure to conform to black stereotypes.\textsuperscript{69} Wendell, who identifies as a top, said that several white and Latino partners encouraged him to perform an aggressive role that is in tension with how he sees himself.\textsuperscript{70} Speaking of one white partner, Wendell stated:

\begin{quote}
He always wants me to be really rough [sexually] \ldots and it causes me to scratch my head sometimes. Whenever I'm having sex, I'm constantly checking in [to see if he's in pain]. And he's like "just f--- the hell out of me. Don't ask me; just f--- me." Which we can do, but I just don't feel comfortable using him \ldots [or] that I should be that hypersexual, really aggressive male.\textsuperscript{71}
\end{quote}

Wendell also spoke about how, growing up in the black community, he was regarded as soft and uppity.\textsuperscript{72} Yet when Wendell began dating nonblack men, they regarded him as aggressive.\textsuperscript{73} Speaking of these nonblack sexual partners, Wendell said: "That's completely them putting it on me."\textsuperscript{74} Unlike Kevin, Wendell experienced conflict between how he was perceived in a mostly straight community of color and the mostly white, gay community.\textsuperscript{75}

These interviews contribute nuance about intersectional identities that is rarely visible in the literature and which tends to focus on outright exclusion of men of certain races or, less frequently, using race to channel them into performing as a top or bottom. Wendell firmly identifies as a top, and Kevin clearly identifies as a bottom. But Kevin resented white men assuming that he would acquiesce to a particular sexual role—the submissive, abject bottom—because of his race.\textsuperscript{76} Similarly, Wendell was flummoxed by nonblack men's demand that he embody an aggressive, angry black top, which is not how he would prefer to perform the top role. These stories show how Kevin's and Wendell's pursuit of sexual liberty was interrupted by their partners' conceptions of racial stereotypes as integral to their sexual pleasure.

III. UNDERSTANDING RACIAL MISEDUCATION: A RESEARCH AGENDA

The juxtaposition of the growing body of research on sexual racism, particularly in gay and bisexual male communities, with the narratives we are hearing in the LGBT Relationships and Well-Being project, points to some

\textsuperscript{68} Id.
\textsuperscript{69} Interview with "Wendell" (Jan. 29, 2017).
\textsuperscript{70} Id.
\textsuperscript{71} Id.
\textsuperscript{72} Id.
\textsuperscript{73} Id.
\textsuperscript{74} Id.
\textsuperscript{75} Id.
\textsuperscript{76} Trevor Hoppe, \textit{Circuits of Power, Circuits of Pleasure: Sexual Scripting in Gay Men's Bottom Narratives}, 14 SEXUALITIES 193, 199, 211 (2011) (finding differences among gay men who identify as bottoms in terms of how much power the bottom wields).
expressing directions for future research on this topic. Why do gay and bisexual men appear to have stronger preferences for whiteness than lesbian and bisexual women? Why do gay and bisexual men—both those who are white and those of color—appear to desire white partners more than their heterosexual counterparts? We suggest that mainstream gay male culture may drive these disparities. A cultural explanation may explain why cisgender lesbian/bisexual women and transgender people seem less likely to practice sexual racism, at least in the overt forms that we see in hookup apps. Online dating and hookup apps play a more marginal role in female and transgender communities and, historically, most gay bars have been reserved for cisgender men. In short, the gender segregation common in LGBT communities may help explain the differences in expressions of sexual racism. Through exposure to mainstream gay culture, such as apps, media, nightlife venues, and pornography, gay and bisexual men may learn that the gay community installs young, athletic white men as the central figure of desire. Moreover, they may learn that men of color are desired only to the extent that they fulfill a white man’s racialized desire. Men who defy these

77. We envision this research spanning multiple disciplines, including psychology, public health, sociology, and law.


79. See, e.g., Robinson, supra note 2, at 2802.

80. This is not to romanticize female relationships as race-neutral or antiracist. Recent research suggests that white women seeking partners online are more likely to prefer women without children, which may have a disparate impact on black and Latina women in the dating pool. Matthew H. Rafalow & Jessica M. Kizer, Mommy Markets: Racial Differences in Lesbians’ Dating Preferences for Women with Children, J. LESBIAN STUD., Nov. 2017, at 1, 1–2. For a critique of LGBT preferences for a “biological model of parenthood,” see generally Michael Boucai, Is Assisted Procreation an LGBT Right?, 2016 WIS. L. REV. 1065. We need more research to detect additional subtle ways in which race may influence female and transgender relationships. Our ongoing study includes a substantial number of women, transgender, and gender nonbinary subjects and is exploring how race functions in these relationships. Our initial results are consistent with the general literature in suggesting that racial preferences and stigma are more prevalent among gay men.

81. See, e.g., Wilson et al., supra note 45, at 408.

82. Id. at 409 (“[I]t is through race-based sexual stereotyping that men of particular racial groups become desirable sexual partners.”). One prevalent manifestation of sexual racism is the assumption that all black men are extremely well endowed, which is associated with hypersexuality and sexual dangerousness. See, e.g., id. (finding that white men expect even black men who clearly identify as a bottom in their profile to be a “big-dick Black top”); see also Niels Teunis, Sexual Objectification and the Construction of Whiteness in the Gay Male Community, 9 CULTURE HEALTH & SEXUALITY 263, 267–68 (2007). Gay pornography often trades on this stereotype by referring to the “big black cock.” No matter how large a white man’s penis is, he is hardly ever described as having a “big white cock.” A scene in the ABC show How to Get Away with Murder featured the lead white gay character engaging in a threesome with a black man and a Latino man. When the black man drops his underwear, the camera zooms in on the white man’s reaction. How to Get Away with Murder: Don’t Tell Annalise (ABC television broadcast Oct. 13, 2016). The mainstream black comedy Girls Trip was similarly marketed with an image of the four black female leads’ slack-jawed response to a dark-skinned black man standing in front of them wearing form-fitting underwear. See Girls Trip, IMP AWARDS, http://www.impawards.com/2017/girls_trip.html [https://perma.cc/PSG4-PV8C] (last visited Apr. 13, 2018). These latter examples are reminders that men may absorb racial stereotypes not only from gay communities but also from the broader culture.
stereotypes (e.g., the black bottom and Asian top) simply have no role to play in the community.83 Scholars could test this theory by examining the degree to which immersion in white-centric aspects of gay culture is associated with endorsement of, and adherence to, these racial and sexual stereotypes. Men who are newly out, or not out at all, and men who have a critical perspective on mainstream gay norms might be more likely to recognize these "lessons in being gay" as stereotypes and see men of color as more appealing partners.

In addition, we need to know more about how gay and bisexual men of color perceive, negotiate, resist, and overcome sexual racism. Thus far, research has focused mainly on the perpetration of sexual racism, with few studies examining the experience of sexual racism from the "target's perspective."84 Kevin and Wendell give us some formative insight into the need to better understand these processes. As many scholars have demonstrated, LGBT community spaces are too often constructed around the needs and desires of white cisgender men.85 We call for more research on how men of color experience and navigate these spaces, as well as how men of color find and form communities that support and facilitate sexual and relational connections that are not limited by sexual racism. How does someone like Kevin progress from playing a racialized role assigned by white men to questioning these power dynamics and becoming open to dating men of various races?86 We might organize this research agenda from the "proximal" to "distal."

At the proximal or immediate level, more needs to be done to understand the potential impact that sexual racism can have on the well-being and relationship potentials of gay and bisexual men of color. For example, we do not yet know how socialization within the kinds of limiting sexual spaces described by Kevin and Wendell is internalized by gay and bisexual men of color. As we noted earlier, although race does not appear to correlate with sexual identity, black and Asian men in particular may face pressure to embody top and bottom roles, respectively. We need more research on role discrepancies—that is, disparities between such men’s personal sexual desires and the desires that potential partners and a larger white-centric gay community expect them to express and perform. Based on scholarship on internalized stigma in other forms, if the prevailing forms of sexual racism are directed inward and applied to the self, sexual racism may contribute to

83. See Teunis, supra note 82, at 270 ("All but one of the African American men spoken with report that they invariably are put in a top position when they have sex with white men. They often indicate that they are more versatile by preference or even bottoms, but such a role is seemingly not available to them.").


85. See Chong-suk Han, They Don’t Want to Cruise Your Type: Gay Men of Color and the Racial Politics of Exclusion, 13 SOC. IDENTITIES 51, 52–56 (2007); David J. Malebranche et al., Masculine Socialization and Sexual Risk Behaviors Among Black Men Who Have Sex with Men: A Qualitative Exploration, 12 MEN & MASCULINITIES 90, 98–102 (2007); Teunis, supra note 82, at 268–70.

86. See supra notes 58–68 and accompanying text.
diminished self-worth and have further negative consequences for the psychological well-being of gay and bisexual men of color. The research that we envision on exposure to mainstream gay culture would include men of color and determine whether one’s distance from mainstream gay culture helps to explain the extent to which he prefers white partners and adheres to racialized roles.

Moreover, sexual racism may limit the relationship possibilities of gay and bisexual men of color. In light of the trend in which opportunities to find sexual and dating partners are migrating from physical to virtual venues in which sexual racism appears particularly prevalent, gay and bisexual men of color may be less able to find relationship partners and pursue their central motives for intimacy and romantic relationship formation. Given that the ability to meaningfully pursue and achieve these kinds of “intimacy projects” is core to individual happiness, regardless of sexual orientation, gender, and race, the limiting potential of sexual racism likely extends beyond the relational domain to impact general mental health and psychological well-being.

At the distal level, we need research that explores how gay and bisexual men of color contest and navigate sexual racism with their sexual partners or potential partners. For example, how do they manage the expectation of exposure to sexual racism in online spaces? Do they rely on social spaces, nightlife venues, and apps that cater to men of color? To the extent that these racial minority venues contain fewer potential partners, what sorts of tradeoffs do they require some men to make in terms of outness, age, socioeconomic status, and other factors? Do some men of color acquiesce to racially demeaning relationships because they perceive no other options?

To the extent that men of color date and form relationships with white partners, how do gay communities (both white communities and communities of color) receive them? Given that racial homogamy (dating within one’s race) remains the norm, especially among white men, do interracial couples experience less social support and connectedness than


88. In light of persistent residential segregation, one would expect online dating to create new possibilities for interaction. See, e.g., Robinson, supra note 2, at 2791–93. However, sexual racism appears to cabin this potential, at least in the gay male community. The shift from dating and hookup websites that are not strictly tied to geography to location-based apps may reinstate the segregated physical boundaries of many cities.


90. Of course, focusing on men of color does not eliminate concerns about racial hierarchy because men in these venues may prefer Latinos to black and Asian men. See supra note 28 and accompanying text. Some research on “gay men of color” does not sufficiently attend to hierarchy among men of color. See generally Han et al., supra note 56.
same-race couples? Do people in gay communities often assume that interracial relationships are driven by fetish or objectification and thus inferior to same-race partnering? How do men who do not conceive of their relationships in such stereotypical terms protect themselves from such stereotypes or seek to rebut them? How might sexual racism shape gay and bisexual men’s sense of sexual and racial identity? In particular, what role does sexual racism play in alienating men of color from gay identity and the gay community? Finally, as suggested by Kevin’s narrative, what role does one’s family of origin play in shaping a gay or bisexual man’s racial preferences? For example, do some men (whether white or of color) experience pressure to choose a same-race partner to please their families? Or does coming out as gay or bisexual free some men to cross race lines and mean that they face less judgment from their families?

For the reasons mentioned above, we contend that sexual racism is a form of racism and prejudice rather than just a “personal preference.” It harms gay and bisexual men of color, and white men who choose to partner with them, and it may exacerbate their experiences of minority stress. In other words, the heightened social stress that all sexual minorities experience relative to their heterosexual peers, due to the continued stigmatization of nonheterosexual sexual behavior and desire, may be further compounded by the racialized stigmatization stemming from sexual racism within the LGBT community perpetrated primarily against gay and bisexual men of color. These intersecting forms of minority stress, coming from both outside of and within the LGBT community, may perpetuate what some have called a “syndemic” of negative social influences that contribute to the oft-observed elevated rates of sexual and mental health problems facing gay and bisexual black and Latino men.

In conducting this research, scholars should take into account structural constraints on gay and bisexual men’s romantic and sexual opportunities. As we have written elsewhere, mainstream culture tends to erase sex between

91. Cf. David M. Frost et al., Social Support Networks Among Diverse Sexual Minority Populations, 86 AM. J. ORTHOPSYCHIATRY 91, 95–98 (2016) (finding that sexual minorities tend to rely on people of the same race and sexual orientation for everyday support and that LGB people of color reported having smaller social-support networks).
92. See Han et al., supra note 56, at 728–29.
93. See supra notes 58–68 and accompanying text.
94. Studies suggest that family scrutiny and expectations are at least a partial explanation for heterosexual white women expressing stronger preferences than heterosexual white men for a same-race partner. See, e.g., Melissa R. Herman & Mary E. Campbell, I Wouldn’t, but You Can: Attitudes Toward Interracial Relationships, 41 SOC. SCI. RES. 343, 346–47 (2012).
97. See Emens, supra note 2, at 1385–400. See generally Robinson, supra note 2 (calling for greater study of structural influences on romantic preferences).
Even when gay people are visible in mainstream media, they tend to be desexualized. Many sexual minority men struggle in determining whether men that they meet in public life are in fact interested in men, in part because of the violence and discrimination that can follow from making a potentially unwelcome advance. The resulting isolation in the general community may pressure sexual minority men to turn to gay apps, bars, and pornography to connect with their sexuality and find experiences that tend to be elusive in their daily lives. In rural spaces, apps such as Grindr may be the only infrastructure for men to connect with men. Yet, as we have documented, gay cultural and networking spaces may entail exposure to sexual racism and thus be harmful to men of color’s health and well-being. Hence, such men face a double bind.

We end this Part with a cautionary note. Like most research in this field, we have focused on the perpetuation of discrimination, and we have also called for additional research on the effects of sexual racism on targets. In these situations, white partners are either excluding people of color or objectifying them. Focusing on sexual racism as such may obscure the many healthy, loving interracial relationships that resist and defy racist norms. We know of no research comparing the prevalence of sexual racism to that of healthy interracial relationships. But we call for researchers to explore expanding their research paradigms to account for positive and redemptive interracial experiences. For example, researchers might ask people of color not only “What types of discrimination have you faced in dating?” but also “Have you had positive interracial experiences? What were they like?” This expansion of the paradigm would produce a more holistic depiction of the full spectrum of interracial relationships, including the infuriating and the inspiring.

CONCLUSION

We began by juxtaposing the LGBT movement’s reliance on Loving to advance LGBT rights and within-group practices that perpetuate sexual racism. We expect that some readers (perhaps especially gay white men who strongly identify with mainstream gay culture) will find this connection threatening and worry that it will undermine LGBT rights. We think that

98. See Robinson & Frost, supra note 54.
99. See, e.g., Kavita B. Ramakrishnan, Inconsistent Legal Treatment of Unwanted Sexual Advances: A Study of the Homosexual Advance Defense, Street Harassment, and Sexual Harassment in the Workplace, 26 BERKELEY J. GENDER L. & JUST. 291 (2011). As documented by several case studies in Ramakrishnan’s article, even men who desire men may experience internalized conflict and respond with violence, and some courts treat such a response to a “homosexual advance” as justifiable. See id. at 305–11.
100. See supra notes 54–57 and accompanying text.
101. The recent engagement of Prince Harry and Meghan Markle, who is biracial, elicited an outpouring of online love from many, including interracial couples and black women, who saw their love as sending a powerful message of inclusion. See, e.g., Javier Moreno, Inspired by This Professor’s Message, Interracial Couples from All Over Are Sharing Their Stories of Love, BUZZFEED (Dec. 30 2017, 3:11 PM), https://www.buzzfeed.com/javiermoreno/a-professor-had-a-compelling-message-about-love-and [https://perma.cc/QP5E-SN4D].
102. See Teunis, supra note 82, at 267–73 (recounting others’ objections).
such concerns are overstated as a legal matter and, more importantly, they would wall off vital lines of scholarly inquiry. The LGBT movement’s success in securing marriage equality and eradicating sodomy laws does not mean that we should regard how individuals exercise these rights as an entirely private matter, insulated from scrutiny.\(^{103}\) To the contrary, a genuine commitment to *Loving*—one of the rare Supreme Court opinions that explicitly condemns “White Supremacy”\(^{104}\)—would require a critical examination of sexual racism. As Kevin’s and Wendell’s stories illustrate, what a white man perceives as his sexual liberty might be felt by his partner of color as a manifestation of sexual racism. To privilege the white man’s freedom to discriminate would be to enshrine white gay men and their desires as the essence of LGBT identity and to tell men of color that they need to check their race-consciousness at the door when they enter gay communities. Regarding *Masterpiece Cakeshop*, we do not think the law should validate a baker’s liberty to discriminate. By contrast, we think the sexual racism context requires a search for frameworks that preserve individual liberty while treating men of color as equal members of the community whose lives and relationship possibilities matter.
