

Countermovements in the States:
Social Movement Strategy in the Same-Sex Marriage Debate

Amanda Pullum
CSD Graduate Student Conference
May 8, 2010

Abstract

For the last decade, same-sex marriage has been one of the most contentious issues in American politics, mobilizing volatile social movements on both sides of the question, and generating discrete outcomes in several American states. I use these cases to examine questions about social movement strategy. I am particularly interested in predicting strategic shifts in response to shifting political conditions and the actions of opponents. To address these questions, I have conducted a qualitative content analysis of activists' efforts on either side of the same-sex marriage debate in seven different states. I find that political opportunity structures play a key role in enabling or constraining strategic action in each state. I argue that three aspects of political opportunity structures—political alignment of elites, policies that enable or constrain implementation of preferred tactics, and laws that favor or oppose one side of the debate—form a model that allows us to predict strategic shifts, and I suggest that further research is necessary in order to examine the applicability of this model to additional cases.

Introduction

After the passage of California's Proposition 8, advocates of same-sex marriage found themselves divided over the next course of action. Most prominent organizations supporting same-sex marriage in California favored overturning Proposition 8 through another ballot measure, but disagreed on whether such an amendment should appear on the ballot in 2010 or 2012. Furthermore, the decision to pursue a federal appeals court challenge to Proposition 8 further divided activists, some of whom chose to support the case, while others remain opposed, arguing that the judiciary was not the best venue within which to act, and that the time was not right for a lawsuit.

As shown by the example of the battle over Proposition 8, the issue of how social movement organizations respond to their opponents in changing political circumstances is ongoing and highly relevant to current events. In this paper, I examine factors that may predict social movements' strategic changes in response to shifting political conditions and the actions of opponents. I use the issue of same-sex marriage as a case study of the influences upon activists' decisions change strategies in order to achieve their stated goals.

Literature Review

Strategic innovation and change

Social movement strategy is, broadly stated, “the overall plan for action, the blueprint of activities with regard to the mobilization of resources and the series of collective actions that movements designate as necessary for bringing about desired social changes” (Jenkins 1981). In short, strategy is the method or methods by which social

movements try to get what they want—or prevent opponents from doing the same. Previous research has conceptualized strategy on both macro (Jasper 2002) and micro levels (Meyer and Staggenborg 2008). However, neither of these views fully explain strategic innovation. In this paper, I analyze strategic shift on an organization-wide level, examining broad shifts in strategy rather than activist-level decision-making processes.

A relatively small number of existing studies have focused on the factors that lead social movement organizations to invent or adopt new strategies. McCammon (2003), for example, argues that political defeats are more important in predicting tactical innovations than are favorable political opportunities; losses cause activists to realize that the current tactics are not effective and encourage them to try new approaches. Rohlinger (2006) lists three major influences on social movement strategy—political opportunities and threats, opposing movements, and allied organizations. She found that opposing movements respond similarly to similar political situations, and concluded that tactics and interactions with other organizations shifted over time in response to political conditions.

Beckwith (2000) argues that "hinges," or opportunities to change a tactical repertoire, emerge following political defeats or activists' perceptions of a high likelihood of defeat, when following the current strategy is deemed too costly, or when targets or opponents are able to respond to current strategy. Beckwith found that striking coal miners borrowed tactics from other organizations when existing tactics were rendered ineffective by court orders. Ultimately, however, the miners took an opportunistic approach, applying nearly every possible tactic.

Operationalizing strategy

In this paper, I use Meyer and Staggenborg's (2008) conceptualization of strategy as having three distinct dimensions: claims, tactics, and venues. *Claims* are the demands made by a movement. Social movement actors must craft claims, or arguments concerning the demands they make to targets and the social changes they seek to bring about or prevent. Groups may make multiple claims simultaneously, or make claims that serve to highlight or provide building blocks for larger, more general claims.

Specific methods, such as protests or ballot initiatives, by which movements work to fulfill these demands are called *tactics*. Tactics may be internal to the movement—intended to build the organization and aid in recruitment—or external to the movement (Reger and Staggenborg 2006). Movements tend to work within the set of tactics, or repertoire, with which they are already familiar (Tilly 1978). Tactical choices are “fairly predictable, limited, and bounded by the repertoires that protesters have learned” (Taylor and VanDyke 1994). However, organizations may modify their tactics as necessary, or adapt tactics from other groups (Meyer and Whittier 1994). Tactics that are successful for one movement are added to other movements' tactical repertoires (McAdam 1983).

Finally, movements make claims and employ tactics within *venues*, the arenas within which social movement activity takes place. I identify three venues: state or federal legislatures, the court system, and the public. The skills and resources that a movement possesses influences its choice of venues (Jasper 2004). Tactical choices are closely tied to venues, since many tactics are venue-specific.

Determinants of strategy

Strategic decisions are made within a context of internal and external factors and constraints, which limit the strategic choices available to activists.. Internal constraints include past experience and the knowledge gained from previous efforts (Tarrow 1998), core values and beliefs (Schein 1985), philosophy concerning particular issue upon which the movement acts (Carmin and Balser 2002), or the beliefs of activists as to which strategies will be most effective given their current political environments (Meyer 1993). In this paper, however, I am most interested in two external factors: political opportunity structures and countermovements.

Social movements are not only in contention with the state; they are often involved in interactions with opposing movements (Meyer and Staggenborg 1996). Movements must constantly shift or invent tactics to counter the actions of opponents (McAdam 1983). In addition, movements may adopt tactics used by their opponents (Mottl 1980), change the political climate in which their opponents operate, shape an opponent's collective identity, or promote stigmatization of an opponent (Van Dyke and Cress 2006).

In a broad sense, scholars of political opportunity believe that social movements are shaped by the political environment—the larger realm of opportunities and constraints—within which they function (McAdam et al. 1996). Political opportunity structures consist of the various factors that make up the political environment within which a social movement organization operates (Eisinger 1973). These factors include the relative degree of openness of the polity, the stability of political alignments, the presence or

absence of allies, the political elite's structure and tolerance to protest, and the state's policy-making capacity (Tarrow 1988).

Political opportunity structure provides a suitable theoretical framework for studying strategic shifts because political opportunities constrain the strategic choices available to social movements (Ennis 1987). Furthermore, political opportunity structures change over time, and activists must make strategic shifts in order to take advantage of new opportunities or compensate for loss of existing opportunities (Meyer 1993).

In this paper, I am primarily concerned about political opportunity structures as they relate to elites, political structures, and states' policies concerning same-sex marriage. I analyze three distinct types of political opportunities: control of a state's legislature by relatively sympathetic *elites*, presence of *rules* that aid organizations in implementing their preferred tactics, and *policies* that support an organization's claims. Political elites are a relatively volatile political opportunity (Gamson and Meyer 1996). Makeup of a state's legislature may shift with any election, although voters in many states consistently lean toward a particular party. Rules such as judicial review and the availability of voter-initiated ballot measures, are highly institutionalized and stable. Finally, policies are quite volatile and may be changed by a single popular vote or the passage of a single bill.

Based upon the existing research discussed in this section, I am able to generate a set of expectations concerning my study. Unlike McCammon, I expect to find that political opportunity structures will play a role in spurring strategic change; political opportunities may enable some strategic approaches while constraining others. In consideration of McCammon's and Beckwith's studies, I expect that strategic change will occur following a

loss or defeat. Organizations will otherwise continue use of existing strategies unless these efforts are precluded by a new development that makes such strategies unfeasible.

Organizations will shift strategies to take advantage of those venues and tactics that make the best use, in the opinions of activists, of the resources available to the organization.

Considering that pro-gay legislation tends to pass more often in legislatures than in direct democratic voting (Haider-Markel et al. 2007), I expect that advocates of same-sex marriage will prefer the legislative venue and avoid tactics of direct democracy, while their opponents will favor the ballot initiative. Finally, applying Beckwith's findings, I expect that organizations may use multiple strategies simultaneously. Because the ultimate goal of strategy is to achieve or prevent some kind of change, organizations may employ multiple tactics in multiple venues in order to take advantage of political opportunities and available resources. I expect that this is most likely to occur in highly contentious situations in which activists do not feel assured of victory or fear that opponents may overturn their gains.

Data and methods

For several reasons, the same-sex marriage debate provides an excellent case study for scholars of social movement. First, there is considerable mobilization on both sides of the issue, as well as strong public opinion on either side. However, the gay and lesbian movement, despite its size and visibility, has been relatively understudied by sociologists (Soule 2004). Finally, the issue is timely, with an ongoing court battle in California and the recent legalization of same-sex marriage in the District of Columbia.

Same-sex marriage has been a highly contentious issue since the early 1990s, following a set of lawsuits in which a Hawaiian same-sex couple sought the right to marry (the *Baake* cases). In 1996, President Bill Clinton signed the Defense of Marriage Act (DOMA), which allowed states to refuse to recognize same-sex marriages performed in other states, and specified that federal law will recognize only heterosexual marriages. DOMA gave federal-level support to efforts to pass state-level constitutional amendments, sometimes referred to as "state DOMAs" (Soule 2004). Today, thirty states currently have amendments that ban same-sex marriage or other recognition of same-sex unions. However, five states and the District of Columbia allow same-sex couples to marry; several additional states offer other forms of legal recognition to same-sex couples.

Existing research on both social movement strategy and opposing movement interactions has focused upon qualitative analyses of case studies of existing movements (see Burstein (1991), Meyer and Staggenborg (2008) and Fetner (2008) for examples). By conducting a comparative study of opposing movements within multiple states, I follow in this tradition. I used a maximum variation sampling technique, identifying seven states within which to focus my analysis: three states that currently allow same-sex marriage (Massachusetts, Vermont, and Iowa), three states that currently ban same-sex marriage or similar legal arrangements (Nebraska, Michigan, and Florida), and California, which legalized same-sex marriage, then banned it via a ballot initiative. To determine which organizations I would study, I strategically sampled the same-sex marriage social movement sector of each state, choosing those critical organizations that played the greatest role in coordinating campaigns in that area. I collected data on one pro same-sex

marriage and one anti same-sex marriage organization in each state, choosing those organizations that appeared to be most active in their respective states. When it was difficult to ascertain which organizations were most active, I chose one of the most active and visible organizations on each side.

My data consist primarily of press releases and web pages produced by or on behalf of the social movement organizations in my sample. I have used the Internet Archive ("Wayback Machine") to locate historical versions of the web pages of each organization. In addition, I include in my analysis newspaper articles, published accounts written by activists, and one in-depth interview conducted with a same-sex marriage activist. I collected data from the entire time period that each website was available on the Internet Archive. In most cases, organizations' previous websites were available beginning in the late 1990s or early 2000s. I conducted a qualitative content analysis of these documents concerning these organizations involved in the same-sex marriage debate, using successive iterations of analysis to examine the sequence of strategies used by each organization. In each reading of the documents, my goals were to verify the strategies used and the time frame in which strategic changes were implemented, and to infer the possible reasons activists may have had for shifting strategies.

Findings

In this section, I elaborate upon the history of the same-sex marriage debate in each state, including the political opportunities available and strategies employed by organizations on each side of the issue.

Massachusetts

| | |
|---------------|---|
| April 2001 | <i>Goodridge v. Dept. of Public Health</i> filed, arguing for the right of same-sex couples to marry in Massachusetts |
| November 2003 | Supreme Judicial Court rules that same-sex must be allowed to marry |
| May 2004 | Same-sex couples begin marrying in Massachusetts |

Massachusetts, a predominantly Catholic, liberal state, was the site of the first legal same-sex marriages in the U.S. In addition, Massachusetts has one of the most complex ballot initiative systems of any state, a constraint that has prevented any constitutional amendments banning same-sex marriage from reaching the voters. This system, along with a state legislature that has long been dominated by Democrats, creates a closed political opportunity structure for opponents of same-sex marriage.

Advocates of same-sex marriage focused on legal tactics in Massachusetts. GLAD (Gay and Lesbian Advocates and Defenders) is an organization made up primarily of lawyers, and the judicial venue allows these activists to use their legal expertise as a resource. However, GLAD has engaged in some limited efforts in the public and legislative venues. Following its victory in *Goodridge v. Department of Health*, which legalized same-sex marriage in Massachusetts, GLAD pursued lobbying and public education tactics in order to protect its gains against MFI's (Massachusetts Family Institute) efforts to overturn the ruling and to spread news of the victory to the public. MFI has made repeated attempts to pass a state DOMA; however, due to the complex ballot initiative system in Massachusetts, the organization has found it necessary to engage in legislative lobbying and to encourage the public to do the same. Because MFI cannot present a marriage

definition amendment to the voters unless it passes two legislative votes, the organization has little choice but to work within the legislature.

Aspects of Massachusetts' political opportunity structure have made MFI's attempts to pass a state DOMA unsuccessful. In Massachusetts, unfavorable policies—in particular, the great difficulty involved in placing an initiative on the ballot—as well as unsympathetic political elites have resulted in MFI focusing its efforts upon anti same-sex marriage organizations' most favored tactic, the ballot initiative. Meanwhile, the same political opportunity structure has been highly favorable for GLAD, which engaged in secondary tactics (in addition to judicial tactics) only when there was a threat or fear of defeat.

Vermont

| | |
|---------------|---|
| July 1997 | VFMTF sues for same-sex marriage rights (<i>Baker v. Vermont</i>) |
| December 1999 | Vermont Supreme Court rules that state must grant equal recognition to same-sex relationships |
| July 2000 | Vermont governor signs civil unions bill passed by the state legislature |
| November 2000 | Republican Party gains control of Vermont House of Representatives |
| November 2004 | Democratic Party gains control of Vermont House of Representatives |
| April 2009 | Vermont governor vetoes same-sex marriage bill, but legislature overrides the veto. Vermont begins to offer same-sex marriages. |

The smallest state in my sample in terms of both population and land area, Vermont is a consistently Democratic state with a lower proportion of racial minorities, lower rates of church attendance, and a lower proportion of children under 18 than any other state in my sample. Vermont's small size makes face-to-face tactics such as town meetings a necessity. Unlike the other states I have studied, opponents of same-sex marriage in Vermont avoided claims based in religion, choosing to argue instead for the right of the people to vote on their own laws (since Vermont does not allow ballot initiatives). After

Vermont enacted the nation's first marriage-like legal status for same-sex couples, opponents of same-sex marriage were able to take advantage of political backlash to hinder additional efforts for the next four years.

Vermont Freedom to Marry Task Force (VFMTF), like GLAD, was founded by a group of lawyers and initially preferred to work within the legal venue in order to take advantage of this resource. In partnership with GLAD, VFMTF successfully litigated *Baker v. Vermont*, in which the Vermont Supreme Court ruled that legal recognition must be granted to same-sex couples. The specifics of how to implement the decision, however, were left to the legislature, and VFMTF found it necessary to switch venues, lobbying legislators to vote for same-sex marriage rather than civil unions, and against a state DOMA.

Take it to the People (TiP), meanwhile, lobbied legislators to place a DOMA referendum on the next ballot. When the Vermont state legislature passed a bill allowing same-sex couples to form civil unions, the bill was considered a loss by both sides. VFMTF saw civil unions as unequal to marriage, which was not acceptable, while TiP saw civil unions as equal to marriage, which was also not acceptable. TiP launched a campaign identifying candidates who favored civil unions, endorsing those who did not favor legal unions for same-sex couples, and publishing voters' guides that could be used as reminders of candidates favored by TiP; these efforts proved to be quite successful. The Vermont House came under the control of the Republican Party, and many of its members were opposed to same-sex marriage.

This closure of the political opportunity structure led VFMTF into a period of relative abeyance. The group shifted its strategy altogether, focusing on building support

for civil unions rather than arguing for marriage. When control of the House returned to the Democrats in 2004, the Task Force returned to its original claims. The group created a five-year plan to achieve legalization of same-sex marriage. No longer facing a politically advantageous environment in Vermont, TiP turned its efforts to the passage of the Federal Marriage Amendment, which ultimately failed. VFMTF's plan, however, was successful. In early 2009, the Vermont legislature legalized same-sex marriages.

Like Massachusetts, Vermont's political opportunity structure was quite favorable for advocates of same-sex marriage. Political elites in Vermont tended to be sympathetic to same-sex unions, and VFMTF acted when its allies were in power. Today, TiP has become LetVermontVote.org; although still advocating the passage of a state DOMA, this organization seems primarily concerned with advocating for a voter initiative system.

Nebraska

| | |
|---------------|--|
| November 2000 | Voters in Nebraska pass Initiative 416, a state DOMA |
| 2003 | CFEP and other plaintiffs file suit challenging state DOMA (<i>Citizens for Equal Protection v. Bruning</i>) |
| May 2005 | A federal district court judge strikes down Nebraska's DOMA |
| 2006 | The lower court's ruling is overturned and the state DOMA is reinstated |

Strongly Republican-leaning Nebraska seems, at first glance, an unlikely site for a victory for same-sex marriage activists. Nebraska, a Midwestern state unique for its unicameral state legislature, might be expected to pass a ban on same-sex marriage with little resistance. Indeed, with a small, highly religious population (53% of Nebraska residents reported attending church at least once per week), Nebraskan opponents of same-sex marriage easily passed one of the earliest state DOMA amendments. However,

this amendment was subsequently challenged and briefly overturned. Nebraska provides an example of the claims and tactics used by advocates of same-sex marriage in a relatively conservative state.

In 2000, the executive director of the Nebraska Family Council (NFC) felt that other states' efforts to "change the definition of marriage" (likely a reference to the recently decided *Baker* and *Baehr* cases) posed a threat to Nebraska. She began a petition drive to place a voter-initiated DOMA (Initiative 416) on the ballot; it passed with 70% of the vote. Following the victory in the Initiative 416 vote, NFC turned its attention to the legislature. However, Citizens for Equal Protection (CFEP), along with a coalition of allied organizations, sued the state of Nebraska in federal district court. In addition, CFEP continued work within the legislative and public venues; the group engaged in public education efforts, and supporters were asked to aid in lobbying elected officials to pass legislation favorable to gay men and lesbians.

In May 2005, the United States District Court ruled in favor of CFEP and the other plaintiffs, striking down the state DOMA. However, the state filed an appeal, forcing CFEP to continue its judicial efforts. The appeals court ruled in July 2006, and this time the outcome was not in favor of same-sex marriage; the earlier decision was unanimously overturned, and Nebraska's DOMA was reinstated. NFC celebrated the victory over "look-a-like marriages," then shifted its attention to legislative matters concerning homosexuality as well as other topics. CFEP and the other plaintiffs asked for a rehearing, but when this request was denied, the plaintiffs went their separate ways. Like NFC, CFEP also turned to

the legislature. Today, same-sex marriage remains illegal in Nebraska, and both organizations are now pursuing other claims.

Nebraska's political opportunity structure has been advantageous for opponents of same-sex marriage. Nebraskan politicians tend to be Republican, and as such are unlikely to support same-sex marriage. Nebraska also has a unique system of placing a voter initiative on the ballot. The signatures of 10% of the state's registered voters, a number that is likely higher than is needed in many other states, must be submitted. However, the conservative political nature of the state likely made signature gathering for Initiative 416 a relatively straightforward matter.

Iowa

| | |
|---------------|--|
| 1998 | Iowa legislature passes marriage definition statute |
| June 2005 | Iowa Supreme Court upholds ruling granting dissolution of a lesbian couple's civil union obtained in Vermont |
| December 2005 | Lawsuit filed challenging Iowa DOMA (<i>Varnum v. Brien</i>) |
| August 2007 | Judge overturns Iowa DOMA, but stays ruling pending appeal |
| April 2009 | Iowa Supreme Court legalizes same-sex marriage in Iowa |

Iowa is a Midwestern, politically complex state; although it tends to lean somewhat Democratic, voting patterns are typically split between the parties. Currently Iowa has one senator from each party, a Democratic governor, and five representatives (two Republicans and three Democrats). Iowa has a relatively high proportion of Protestant churchgoers; 46% of Iowans reported attending church at least once per week. This, however, did not result in a lack of political opportunities for advocates of same-sex marriage. Taking an

Iowa Supreme Court ruling granting a dissolution of a lesbian couple's civil union as a signal, same-sex marriage supporters saw the Iowa judiciary as a favorable venue choice.

The Iowa Family Policy Center (IFPC) did not explicitly emphasize an opposition to same-sex marriage until late 2003 (coinciding with the *Goodridge* decision and discussion of the Federal Marriage Amendment). At this time, IFPC expanded its legislative efforts to include supporting the FMA and a state DOMA amendment in Iowa. In June 2005, however, the Iowa Supreme Court upheld a lower court's decision granting dissolution of a lesbian couple's civil union obtained in Vermont. According to IFPC-sponsored organization Let Us Vote Iowa (LUV Iowa), "That sent a signal to homosexual activists and lawyers that the time was right to begin a frontal assault on marriage in Iowa." Indeed, in December 2005, Lambda Legal filed a lawsuit in Polk County, Iowa district court challenging the denial of marriage licenses to six same-sex couples. One Iowa was founded shortly after the filing of the Polk County case, and marriage was the organization's primary claim. One Iowa's events were largely related to fundraising efforts.

The Polk County District Court ruled in August 2007 that the state of Iowa may not deny same-sex couples the right to marry, but the decision was stayed pending an appeal. IFPC intensified its efforts toward a DOMA and held a pro-IMA rally at the Iowa Capitol in January 2008. One Iowa responded to this action by claiming that "showing up to counter-protest won't help us win," and instead reassured supporters that the organization's primary goal was to prevent passage of the IMA.

In April 2009, the Iowa Supreme Court upheld the lower court's ruling, and Iowa became the third state to legalize same-sex marriage. Today, IFPC sponsors LUV Iowa, an

organization advocating a popular vote on the IMA. Meanwhile, One Iowa is currently planning a celebration of the one-year anniversary of same-sex marriage in the state; however, with the possibility of the IMA eventually appearing on the ballot, the organization has not moved beyond the cause of same-sex marriage. Today, One Iowa's website still focuses primarily upon marriage-related issues.

Political elites in Iowa are not consistently representative of one party or another, and as such it is difficult to argue for or against elite support of same-sex marriage in that state. However, advocates of same-sex marriage were able to identify a potential opportunity in the judicial venue following a ruling favorable to legalized same-sex unions. Iowa does not allow voter-initiated ballot measures, a policy that is clearly a disadvantage for anti same-sex marriage organizations.

Florida

| | |
|---------------|--|
| 1997 | Florida legislature passes marriage definition statute |
| November 2008 | Florida voters approve state DOMA amendment |

Florida's population is the second largest of the states in my sample and is older than that of the other six states I have studied, with approximately 17% of Florida's population over age 65. Despite its "swing state" designation, the debate over same-sex marriage in Florida has been relatively straightforward. Facing difficulty in meeting other legislative goals, Equality Florida placed less priority on marriage rights. Meanwhile, Florida4Marriage was able to take advantage of unique rules allowing additional time to

gather signatures for a DOMA. Florida offered few political opportunities for advocates of same-sex marriage, who persisted in the legislative venue despite repeated losses.

Until Massachusetts' *Goodridge* decision in 2003, Equality Florida's efforts were largely concerned with repeated attempts to pass legislation concerning LGBT adoption and school safety; these efforts took place within the legislature. Shortly after the *Goodridge* decision legalized same-sex marriage in Massachusetts, Equality Florida introduced a petition campaign to repeal Florida's law banning same-sex marriage. However, remaining focused on school safety and adoption, the organization's director wrote, "Let's hope the momentum [from the *Goodridge* victory] brings us a victory on the Florida adoption legal battle that will be decided soon."

In February 2005, Florida4Marriage began collecting signed petitions in order to place the Florida Marriage Protection Amendment on the November 2006 ballot. Equality Florida made note of these petition-gathering efforts in April 2005, encouraging supporters to donate money, volunteer, and ask others to join in opposition to the proposed amendment. By the February 1, 2006 deadline, however, Florida4Marriage had fallen short of the necessary number of signatures. With the failure of the signature-gathering efforts in 2006 and the Federal Marriage Amendment now unlikely to pass, Equality Florida lessened its emphasis on marriage. Fortunately for opponents of same-sex marriage, however, under Florida law, the signatures already gathered remained valid for placing the amendment on the ballot in November 2008. Florida4Marriage launched another petition-gathering drive in order to obtain the remaining signatures. Ultimately, these efforts succeeded and the DOMA passed with 62% of the vote.

In terms of political opportunity structures, Florida is similar to Iowa in that neither party dominates state politics. However, Florida's policies are far more favorable to opponents of same-sex marriage than are those in Iowa. Not only does Florida allow voter-initiated ballot measures, but Florida4Marriage was also able to retain the signatures already gathered and use them to qualify a state DOMA for placement on the next ballot. This policy allowed the organization a second chance to gather additional signatures, leading to the passage of the Florida DOMA.

Michigan

| | |
|----------------|---|
| November 2004 | Michigan voters pass Proposal 2, a state DOMA |
| May 2005 | Pride at Work and ACLU file lawsuit arguing that Proposition 2 does not prohibit granting benefits to employees' same-sex domestic partners |
| September 2005 | Ruling that public agencies can provide same-sex partner benefits |
| January 2007 | Michigan Court of Appeals overturns lower court's ruling |
| May 2008 | Michigan Supreme Court upholds the appeals court's ruling |

For many Michigan residents, employment has been closely connected to automobile manufacturing, and nearly 20% of Michigan workers were represented by unions in 2009. Similarly, organized labor has been an important actor in the struggle over same-sex marriage in that state. In Michigan, the interpretation of the state DOMA was challenged by two national organizations, the ACLU and National Pride at Work (an AFL-CIO constituency group supporting lesbian and gay workers). Although Michigan has cast its electoral votes for the Democratic candidate in the last three elections, its last ten governors have included five Democrats and five Republicans. Republicans currently hold

the majority in the state's Senate, but Democrats control the House, indicating a lack of consistent support for either party.

Following the *Goodridge* decision, Citizens for Traditional Values (CTV) and allies began collecting signatures to place a state DOMA on the ballot. In response, Michigan Equality launched a "Decline to Sign" campaign urging voters not to sign the petitions. Ultimately, however, the amendment passed with about 59% of the vote. After the DOMA's passage, CTV shifted its claims away from matters of sexual orientation.

In May 2005, National Pride at Work filed a lawsuit on behalf of multiple employees of the City of Kalamazoo, arguing that the recently passed amendment did not prohibit public agencies from providing benefits to employees' same-sex partners. Michigan Equality's role in this lawsuit and subsequent appeal remained supportive; many of the organization's efforts were dedicated to other LGBT-related claims. Following an initial loss in court, Michigan Equality—an organization that by its own admission was not particularly interested in judicial tactics—refocused its efforts on the public venue. These efforts, however, ultimately failed; the Michigan Supreme Court found that under the state DOMA, public employers could not offer benefits to employees' domestic partners.

Michigan, like Iowa, does not consistently elect officials from one party. It is therefore difficult to argue that elites in Michigan represent a political opportunity for either side. However, Michigan does allow for voter-initiated constitutional amendments, and its process for placing an initiative on the ballot requires only the submission of signatures equal to 10% of the votes cast in the previous gubernatorial election. This policy is quite favorable to opponents of same-sex marriage.

California

| | |
|---------------|--|
| March 2000 | Voters pass Proposition 22, a marriage definition statute |
| February 2004 | Mayor Gavin Newsom marries same-sex couples in San Francisco |
| May 2008 | Proposition 22 overturned, legalizing same-sex marriage |
| November 2008 | Proposition 8 passes; same-sex marriages no longer offered |
| November 2008 | <i>Strauss v. Horton</i> filed challenging Proposition 8 |
| May 2009 | Proposition 8 upheld; marriages performed before its passage are valid |
| May 2009 | <i>Perry v. Schwarzenegger</i> filed to challenge Proposition 8 in federal court |

California is a staunchly Democratic state with a large, racially diverse, and young population; as such, we might suspect that its citizens would readily accept same-sex marriage, but this has not been the case. Instead, over the past decade California has been the site of an ongoing battle over same-sex marriage in which activists on both sides of the issue have pursued a variety of tactics spanning all four venues. In addition, California's large size (in terms of both population and geographic area) have made expensive mass media campaigns a prominent tactic in this state.

In February 2004, San Francisco's newly elected mayor, Gavin Newsom, began issuing marriage licenses to same-sex couples. Proposition 22 Legal Defense and Education Fund (which later became Protect Marriage) and allies filed lawsuits arguing that Newsom was acting in violation of Proposition 22, the state's marriage definition law. San Francisco officials countered with their own lawsuit, arguing that Proposition 22 was unconstitutional; however, Newsom was later ordered to stop issuing same-sex marriage licenses, and the marriages were nullified. Equality California and allies filed a lawsuit challenging California's marriage laws, and private attorneys filed two more lawsuits for a total of six cases. This cases were later combined into one (*In re Marriage Cases*).

In August 2004, the California Supreme Court ruled that San Francisco's same-sex marriages were invalid. Protect Marriage soon began working to place a DOMA on the ballot. While these efforts failed, Protect Marriage continued its pursuit of a DOMA initiative in 2008. However, in May 2008, the California Supreme Court overturned Proposition 22, legalizing same-sex marriage in California. This time, Protect Marriage collected and submitted enough signatures to place a marriage definition amendment (Proposition 8) on the November 2008 ballot. Equality California continued a vigorous campaign against the amendment and both sides launched statewide mass media campaigns in the months leading up to the election. Finally, Proposition 8 passed in November 2008 with about 52% of the vote. The next day, both campaigns were back in court. Opponents of Proposition 8 argued that it was an illegal revision of the state's Constitution. Protect Marriage joined the case in support of Proposition 8, while Equality California launched a public education campaign using mass media and face-to-face tactics.

In May 2009, the California Supreme Court ruled that Proposition 8 was not an illegal revision of the state's Constitution. Shortly before this ruling, a challenge to Proposition 8 was filed in federal district court. This case (*Perry v. Schwarzenegger*) is currently in progress, but it is widely expected to make its way to the U.S. Supreme Court.

California's tendency to elect Democratic politicians who often sympathize with same-sex marriage supporters is an important opportunity for activists on that side of the issue; however, the state's policies are more favorable to their opponents. California has a relatively simple process for placing a voter initiated amendment on the ballot, requiring signatures equal to only 8% of the number of votes cast in the previous gubernatorial

election (fewer for statutes such as Proposition 22). Opponents of same-sex marriage have twice pursued ballot initiatives, and pro same-sex marriage groups now plan to do so.

Discussion

In each state, I have found that the three aspects of political opportunity—elites, rules, and policies—influence strategic change. Table 1 lists the side of the debate (pro same-sex marriage or anti same-sex marriage) that benefits most from each of these political opportunities in each state, as well as the claim currently being made by activists on either side of the issue. By "elites," I mean a tendency to elect officials who hold liberal (more likely to favor same-sex marriage) or conservative (more likely to be opposed) beliefs. By "rules," I mean the presence and ease of accessibility to ballot initiatives, which are a highly successful tactic for opponents of same-sex marriage. Finally, by "policies," I mean the outcome of the same-sex debate in that state.

Table 1: Political opportunities and current claims, by state

| State | Elites | Rules | Policies | Anti same-sex marriage organization | Pro same-sex marriage organization |
|---------------|--------|------------------|----------|-------------------------------------|------------------------------------|
| Massachusetts | Pro | Anti (in theory) | Pro | Persist | New claims |
| Vermont | Pro | Pro | Pro | New claims | New claims |
| Iowa | Mixed | Pro | Pro | Persist | Persist |
| Florida | Mixed | Anti | Anti | New claims | New claims |
| Nebraska | Anti | Anti | Anti | New claims | New claims |
| Michigan | Mixed | Anti | Anti | New claims | New claims |
| California | Pro | Anti | Mixed | Persist | Persist |

Political opportunities, in the form of supportive policies, favorable laws, and elite allies, have played a role in strategic decisions as well as outcomes in all seven states. In all states in the sample (except California, which is still undecided), the side that was ultimately victorious was able to take advantage of policies that allowed for implementation of favored tactics. Voter-initiated ballot measures are not allowed in any of the states in my sample that have legalized same-sex marriage, while in the states that allow such initiatives, activists have placed on the ballot and voters have passed state DOMAs. In four of the seven states in my sample, elite allies aided the winning side. In the remaining three states, it is difficult to argue for or against the presence of elite allies, since these states do not consistently vote for one party.

Finally, following the establishment of laws allowing or banning same-sex marriage, the winning side tended to move on to new claims, especially if none of the three opportunities listed above were available to opponents. The losing side, however, tended to continue its challenges if any of these three political opportunities remained favorable, despite an unsuccessful outcome. This suggests that even though a tactic has failed, it may still be the organization's best choice of action. For example, in Massachusetts, the ballot initiative system is one of the only tactics that is still available to opponents of same-sex marriage; even though it has failed repeatedly, it represents the best option for activists. Meanwhile, in Iowa, hope for a legislatively-referred DOMA ballot measure has caused opponents of same-sex marriage to continue pursuit of this claim, and fear of opponents' success has led advocates of same-sex marriage to prepare to defend their victory.

Table 2: Major strategic choices in each state

| State | Strategies: Pro | Strategies: Anti | Initiated action | Winner |
|---------------|--|--|------------------|-----------|
| California | Judicial, Legislative, Public, Ballot initiative | Judicial, Legislative, Public, Ballot initiative | Anti | Undecided |
| Florida | Judicial, Legislative, Public | Ballot initiative | Anti | Anti |
| Iowa | Judicial | Legislative, Public, Ballot initiative | Pro | Pro |
| Massachusetts | Judicial, Public | Legislative, Ballot initiative | Pro | Pro |
| Michigan | Judicial, Legislative | Legislative, Ballot initiative | Anti | Anti |
| Nebraska | Judicial, Legislative | Legislative, Ballot initiative | Anti | Anti |
| Vermont | Judicial, Legislative | Legislative, Public | Pro | Pro |

As shown by Table 2, pro same-sex marriage organizations tended to avoid using ballot initiatives; California is an exception, as a ballot initiative to overturn Proposition 8 is currently planned for 2012. However, advocates of same-sex marriage in California have utilized tactics in all other venues during this ongoing battle, and the relatively liberal nature of the state's electorate may represent an opportunity for these activists. Similarly, anti same-sex marriage activists in California have engaged in judicial tactics. The battle over same-sex marriage in California lends support to my expectation that especially in closely contested struggles, activists will employ a wide variety of tactics, although favored tactics (such as ballot initiatives for anti same-sex marriage activists) will still be preferred.

Conclusion

Over the two decades, same-sex marriage has become one of the United States' most contentious social policy issues. Although the federal government has taken the opposing position in the form of the Defense of Marriage Act, state governments are divided on the issue, with some allowing same-sex marriage, some allowing civil unions or domestic partnerships, and some banning any or all of these legal statuses. In this paper I have examined case studies of organizations on opposing sides of the same-sex marriage debate in seven different states. I find that while organizations tend to have preferred venues and sets of tactics, especially in closely contested struggles, most organizations pursue tactics in multiple venues simultaneously. Three aspects of political opportunity structures—elites, rules, and laws—can help to predict strategic shifts on both sides of the same-sex marriage debate. Organizations faced with a lack of political opportunities after a loss tend to move on to new claims, while open political opportunities can inspire activists to persist in their claims even after a loss. Strategic innovation, therefore, does not necessarily happen following a loss, unless that loss precludes further use of the strategy in question.

Although the seven cases I have examined in this paper show support for political opportunity structures as a tool for predicting strategic shifts, more research is needed to determine whether these findings can be generalized to other social movements. Further research might apply this model to additional cases of opposing movements concerned with other claims or contentious issues.

Appendix A: Requirements for placing voter initiatives on ballot

| State | Procedure |
|----------------------|---|
| Alabama | No voter initiatives allowed. |
| Alaska | Payment of \$100 and signatures of 10% of number of votes cast in previous general election. |
| Arizona | Signatures of 10% of number of votes cast in previous gubernatorial election (15% for constitutional amendment). |
| Arkansas | Signatures of 8% of number of votes cast in previous gubernatorial election (10% for constitutional amendment). |
| California | Signatures of 5% of number of votes cast in previous gubernatorial election (8% for constitutional amendment). |
| Colorado | Signatures of 5% of number of votes cast in previous Secretary of State election. |
| Connecticut | No voter initiatives allowed. |
| Delaware | No voter initiatives or legislative referenda allowed. |
| District of Columbia | Only statutes allowed. Requires signatures of 5% of registered voters, based on official count issued 30 days before signatures are due. |
| Florida | Only constitutional amendments allowed. Requires signatures of 8% of number of votes cast in previous Presidential election. |
| Georgia | No voter initiatives allowed. |
| Hawaii | No voter initiatives allowed. |
| Idaho | Only statutes allowed. Requires signatures of 6% of number of votes cast in previous general election. |
| Illinois | Only constitutional amendments allowed. Requires signatures of 8% of number of votes cast in previous gubernatorial election. Rarely used due to difficulty in getting binding initiatives on ballot. |
| Indiana | No voter initiatives allowed. |
| Iowa | No voter initiatives allowed. |
| Kansas | No voter initiatives allowed. |
| Kentucky | No voter initiatives allowed. |
| Louisiana | No voter initiatives allowed. |
| Maine | Indirect initiative statutes. Only statutes allowed. Requires signatures of 10% of number of votes cast in previous gubernatorial election. |
| Maryland | No voter initiatives allowed. |
| Massachusetts | Indirect initiative statutes and amendments. Requires signatures of 3% of votes cast in previous gubernatorial election. Legislature must approve petitions for new laws, then signatures of an additional 0.5% of votes cast in previous gubernatorial election must be obtained. (Constitutional amendments must be approved by 25% of legislators in two consecutive sessions, but additional signatures not necessary.) |
| Michigan | Indirect initiative statutes. Signatures of 8% of number of votes cast in previous gubernatorial election (10% for constitutional amendment). |
| Minnesota | No voter initiatives allowed. |
| Mississippi | Indirect initiative amendments. Only amendments allowed. Requires signatures of 12% of number of votes cast in previous gubernatorial election. |
| Missouri | Signatures of 5% of number of votes cast in previous gubernatorial election (8% for constitutional amendment). |
| Montana | Signatures of 5% of number of votes cast in previous gubernatorial election (10% for constitutional amendment). |

| | |
|----------------|---|
| Nebraska | Signatures of 7% of registered voters (10% for constitutional amendment). Required number of signatures is calculated based on number of registered voters on day of deadline for turning in signatures, making it impossible for petitioners to know beforehand the exact number of signatures needed. |
| Nevada | Indirect initiative statutes. Requires signatures of 10% of votes cast in previous general election. Voters must approve proposed amendments in two consecutive elections. |
| New Hampshire | No voter initiatives allowed. |
| New Jersey | No voter initiatives allowed. |
| New Mexico | No voter initiatives allowed. |
| New York | No voter initiatives allowed. |
| North Carolina | No voter initiatives allowed. |
| North Dakota | Signatures of 2% of the state's population as of last Census (4% for constitutional amendment). |
| Ohio | Indirect initiative statutes. Signatures of 3% of number of votes cast in previous gubernatorial election (10% for constitutional amendment). |
| Oklahoma | Signatures of 8% of votes cast in last general election for the office receiving the highest number of votes (15% for constitutional amendment; 25% for previously rejected initiatives) |
| Oregon | Signatures of 6% of number of votes cast in previous gubernatorial election (8% for constitutional amendment). |
| Pennsylvania | No voter initiatives allowed. |
| Rhode Island | No voter initiatives allowed. |
| South Carolina | No voter initiatives allowed. |
| South Dakota | Signatures of 5% of number of votes cast in previous gubernatorial election (10% for constitutional amendment). |
| Tennessee | No voter initiatives allowed. |
| Texas | No voter initiatives allowed. |
| Utah | Optional indirect initiative statutes. Only statutes allowed. Indirect initiative statutes require signatures of 5% of number of votes cast in previous gubernatorial election (10% for direct initiative statutes). |
| Vermont | No voter initiatives allowed. |
| Virginia | No voter initiatives allowed. |
| Washington | Optional indirect initiative statutes. Only statutes allowed. Both indirect and direct initiative statutes require signatures of 8% of number of votes cast in previous gubernatorial election. |
| West Virginia | No voter initiatives allowed. |
| Wisconsin | No voter initiatives allowed. |
| Wyoming | Only statutes allowed. Requires signatures of 15% of number of votes cast in previous general election. |

In indirect initiative processes, after signatures are submitted, the state's legislature has the option to pass the initiative rather than putting it on the ballot. If the legislature takes no action, or if the governor vetoes the bill, the initiative is placed on the ballot. The legislature in some states may also amend the initiative, and both versions will then appear on the ballot. Initiative sponsors in Utah and Washington may choose whether they wish to use the direct or indirect process. In Massachusetts, the legislature may reject the initiative, in which case it does not appear on the ballot.

Appendix B: Status of same-sex unions in the United States

| State | Legalized same-sex marriage? If yes, year legalized. | Legalized other same-sex unions? If yes, type and year legalized. | Passed marriage definition amendment? If yes, year enacted and type of ban. | Recognizes same-sex marriage performed elsewhere? |
|----------------------|--|---|---|---|
| Alabama | No | No | 2006: bans all unions | No |
| Alaska | No | No | 1998: bans only marriage | No |
| Arizona | No | No | 2008 (failed to pass in 2006): bans only marriage | No |
| Arkansas | No | No | 2004: bans all unions | No |
| California | No (overturned by voters in 2008) | 1999: domestic partnership | 2008: bans only marriage | Yes, if performed before November 2008 |
| Colorado | No | 2008: domestic partnership (limited) | 2006: bans only marriage | Yes, as domestic partnerships. |
| Connecticut | 2008 | 2005: civil unions (become marriages in 2010) | No | Yes |
| Delaware | No | No | No | No |
| District of Columbia | 2010 | 2002: domestic partnership (created in 1992, but not funded until 2002) | n/a | Yes |
| Florida | No | No | 2008: bans all unions | No |
| Georgia | No | No | 2004: bans all unions | No |
| Hawaii* | No | 1997: reciprocal beneficiary relationship (limited) | 1998: bans only marriage | No |
| Idaho | No | No | 2006: bans all unions | No |
| Illinois | No | No | No | No |
| Indiana | No | No | No | No |
| Iowa | 2009 | No | No | Yes |
| Kansas | No | No | 2005: bans all unions | No |
| Kentucky | No | No | 2004: bans all unions | No |
| Louisiana | No | No | 2004: bans all unions | No |
| Maine | No (vetoed by voters in 2009) | 2004: domestic partnerships (limited) | No | No |
| Maryland | No | 2008: domestic partnership (limited) | No | No |
| Massachusetts | 2004 | No | No | Yes |
| Michigan | No | No | 2004: bans all unions | No |
| Minnesota | No | No | No | No |
| Mississippi | No | No | 2004: bans only marriage | No |

| | | | | |
|----------------|------|--|--------------------------|-----------------------|
| Missouri | No | No | 2004: bans only marriage | No |
| Montana | No | No | 2004: bans only marriage | No |
| Nebraska | No | No | 2000: bans all unions | No |
| Nevada | No | 2009: domestic partnerships | 2002: bans only marriage | No |
| New Hampshire | 2010 | 2008: civil unions (become marriages by 2011) | No | Yes, as civil unions? |
| New Jersey | No | 2007: civil unions: 2004: domestic partnerships | No | Yes, as civil unions. |
| New Mexico** | No | No | No | No |
| New York** | No | No | No | Yes |
| North Carolina | No | No | No | No |
| North Dakota | No | No | 2004: bans all unions | No |
| Ohio | No | No | 2004: bans all unions | No |
| Oklahoma | No | No | 2004: bans all unions | No |
| Oregon | No | 2008: domestic partnerships | 2004: bans only marriage | No |
| Pennsylvania | No | No | No | No |
| Rhode Island** | No | No | No | No |
| South Carolina | No | No | 2006: bans all unions | No |
| South Dakota | No | No | 2006: bans all unions | No |
| Tennessee | No | No | 2006: bans only marriage | No |
| Texas | No | No | 2005: bans all unions | No |
| Utah | No | No | 2004: bans all unions | No |
| Vermont | 2009 | No | No | Yes |
| Virginia | No | No | 2006: bans all unions | No |
| Washington | No | 2007: domestic partnerships (considered by the state to have rights equal to marriage) | No | No |
| West Virginia | No | No | No | No |
| Wisconsin*** | No | 2009: domestic partnerships (limited) | 2006: bans all unions | No |
| Wyoming | No | No | No | No |

* Voters in Hawaii passed a constitutional amendment in 1998 allowing the legislature to limit marriage to one man and one woman. The Hawaiian legislature exercised this power soon after the amendment's passage.

**While many states have laws against same-sex marriage (but not constitutional amendments), only New Mexico, New York, and Rhode Island currently have no legislation defining marriage.

*** Wisconsin has both domestic partnerships and a constitutional amendment that bans marriage and similar same-sex unions. Opponents of the domestic partnership law have filed a challenge with the Wisconsin Supreme Court.

Appendix C: State-by-state comparison

| State | Legislature | Population | Race | Age | % Catholic | Church attendance (2006) | Presidential voting |
|---------------|--|------------|---|---------------------------------|------------|--------------------------|---|
| California | Assembly: 80 members, 2 year terms Senate: 40 members, 4 year terms | 36,756,666 | White: 76.6%; Black: 6.7%; Asian: 12.5%; American Indian/ Alaskan Native: 1.2% | 25.5% under 18 11.2% over 65 | 28.6% | 32% | Obama, 60.9% Kerry, 54.6% Gore, 54% |
| Florida | House: 120 members, 2 year terms Senate: 40 members, 2 year terms | 18,328,340 | White: 79.8%; Black: 15.9%; Asian: 2.3%; American Indian/ Alaskan Native: 0.5% | 21.8% under 18 17.4% over 65 | 13.0% | 39% | Obama, 50.9% Bush, 52.1% Bush, 49% |
| Iowa | House: 100 members, 2 year terms Senate: 50 members, 4 year terms | 3,002,555 | White: 94.2%; Black: 2.7%; Asian: 1.6%; American Indian/ Alaskan Native: 0.4% | 23.7% under 18 14.8% over 65 | 16.7% | 46% | Obama, 54.0% Bush, 50.1% Gore, 49% |
| Massachusetts | House: 160 members, 2 year terms Senate: 40 members, 2 year terms | 6,497,967 | White: 86.2%; Black: 7.0%; Asian: 4.9%; American Indian/ Alaskan Native: 0.3% | 22.0% under 18 13.4% over 65 | 42.0% | 31% | Obama, 62.0% Kerry, 62.1% Gore, 60% |
| Michigan | House: 110 members, 2 year terms Senate: 38 members, 4 year terms | 10,003,422 | White: 81.2%; Black: 14.2%; Asian: 2.4%; American Indian/ Alaskan Native: 0.6% | 23.9% under 18 13.0% over 65 | 21.9% | 42% | Obama, 57.4% Kerry, 51.2% Gore, 51% |
| Nebraska | Legislature: 49 members, 4 year terms | 1,783,432 | White: 91.4%; Black: 4.5%; Asian: 1.7%; American Indian/ Alaskan Native: 1.1% | 25.1% under 18 13.5% over 65 | 20.7% | 53% | McCain, 56.8% Bush, 66.6% Bush, 63% |
| Vermont | House: 150 members, 2 year terms Senate: 30 members, 2 year terms | 621,270 | White: 96.4%; Black: 0.9%; Asian: 1.1%; American Indian/ Alaskan Native: 0.4% | 20.8% under 18 13.9% over 65 | 19.0% | 24% | Obama, 67.8% Kerry, 59.1% Gore, 51% |

References

- Beckwith, Karen. 2000. "Hinges in Collective Action: Strategic Innovation in the Pittston Coal Strike." *Mobilization* 5:179-199.
- Burstein, Paul. 1991. "Legal Mobilization as a Social Movement Tactic: The Struggle for Equal Employment Opportunity." *The American Journal of Sociology* 96:1201-1225.
- Carmin, Joann and Deborah B. Balsler. 2002. "Selecting Repertoires of Action in Environmental Movement Organizations: An Interpretive Approach." *Organization & Environment* 15:365-288.
- Eisinger, Peter K. 1973. "The Conditions of Protest Behavior in American Cities." *The American Political Science Review* 67:11-28.
- Ennis, James G. 1987. "Fields of Action: Structure in Movements' Tactical Repertoires." *Sociological Forum* 2:520-533.
- Fetner, Tina. 2008. *How the Religious Right Shaped Gay and Lesbian Activism*. Minneapolis, MN: University of Minnesota Press.
- Gamson, William A. and David S. Meyer. 1996. "Framing political opportunity." in *Comparative Perspectives on Social Movements: Political Opportunities, Mobilizing Structures, and Cultural Framings*, edited by D. McAdam, J. D. McCarthy, and M. N. Zald. New York: Cambridge University Press.
- Haider-Markel, Donald P., Alana Querze, and Kara Lindaman. 2007. "Lose, Win, or Draw?: A Reexamination of Direct Democracy and Minority Rights." *Political Research Quarterly* 60:304-314.
- Jasper, James M. 2002. "A Strategic Approach to Collective Action: Looking for Agency in Social-Movement Choices." *Mobilization* 9:1-16.
- . 2004. "A Strategic Approach to Collective Action: Looking for Agency in Social-Movement Choices." *Mobilization* 9:1-16.
- Jenkins, J. Craig. 1981. "Sociopolitical Movements." in *The Handbook of Political Behavior*, edited by S. L. Long. New York: Plenum Press.
- McAdam, Doug. 1983. "Tactical Innovation and the Pace of Insurgency." *American Sociological Review* 48:735-754.
- McAdam, Doug, John D. McCarthy, and Mayer N. Zald. 1996. "Introduction: Opportunities, Mobilizing Structures, and Framing Processes--Toward a Synthetic, Comparative Perspective on Social Movements." in *Comparative Perspectives on Social Movements: Political Opportunities, Mobilizing Structures, and Cultural Framings*, edited by D. McAdam, J. D. McCarthy, and M. N. Zald. New York: Cambridge University Press.
- McCammon, Holly J. 2003. "'Out of the Parlors and into the Streets': The Changing Tactical Repertoire of the U.S. Women's Suffrage Movements." *Social Forces* 81:787-818.
- Meyer, David S. 1993. "Protest Cycles and Political Process: American Peace Movements in the Nuclear Age." *Political Research Quarterly* 46:451-479.
- Meyer, David S. and Suzanne Staggenborg. 1996. "Movements, Countermovements, and the Structure of Political Opportunity." *The American Journal of Sociology*, 101:1628-1660.

- . 2008. "Opposing Movement Strategies in U.S. Abortion Politics." *Research in Social Movements, Conflicts and Change* 28:207-238.
- Meyer, David S. and Nancy Whittier. 1994. "Social Movement Spillover." *Social Problems* 41:277-298.
- Mottl, Tahi L. 1980. "The Analysis of Countermovements." *Social Problems* 27:620-635.
- Reger, Jo and Suzanne Staggenborg. 2006. "Patterns of Mobilization in Local Movement Organizations: Leadership and Strategy in Four National Organization for Women Chapters." *Sociological Perspectives* 49:297-323.
- Rohlinger, Deana A. 2006. "Friends and Foes: Media, Politics, and Tactics in the Abortion War." *Social Problems* 53:537-561.
- Schein, Edgar H. 1985. *Organizational culture and leadership*. San Francisco: Jossey-Bass Publishers.
- Soule, Sarah A. 2004. "Going to the Chapel? Same-Sex Marriage Bans in the United States, 1973-2000." *Social Problems* 51:453-477.
- Tarrow, Sidney. 1988. "National Politics and Collective Action: Recent Theory and Research in Western Europe and the United States." *Annual Review of Sociology* 14:421-440.
- . 1998. *Power in Movement: Social Movements and Contentious Politics*. New York: Cambridge University Press.
- Taylor, Verta and Nella VanDyke. 1994. "'Get Up, Stand Up': Tactical Repertoires of Social Movements." in *The Blackwell Companion to Social Movements*, edited by D. A. Snow, S. A. Soule, and H. Kriesi. Malden, MA: Blackwell Publishing.
- Tilly, Charles. 1978. *From Mobilization to Revolution*. New York: Random House.
- Van Dyke, Nella and Ronda Cress. 2006. "Political Opportunities and Collective Identity in Ohio's Gay and Lesbian Movement, 1970 to 2000." *Sociological Perspectives* 49:503-526.
- "Wayback Machine". (<http://www.archive.org/>).