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ACCORDING TO OUR HEARTS: RHINELANDER V. RHINELANDER AND THE LAW OF THE
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BOOK REVIEW: According to Our Hearts: Rhinelander v. Rhinelander and the Law of the Multiracial Family, By Angela Onwuachi-Willig. New Haven: Yale University Press, 2013. 325 pp. \$ 38.00 cloth.

June, 2014

Reporter

48 Law & Soc'y Rev. 492 *

Author: Jinee Lokaneeta, EditorReviewed by Bernie D. Jones, Suffolk University School of Law

Angela Onwuachi-Willig has written a compelling book about the significance that the *Rhinelander v. Rhinelander* annulment case has for modern day mixed-race families. It reads like two books in one, which if anything, allows it to bridge the stories of mixed-race families through time. Drawing upon evidence from the Rhinelander trial and other publicity regarding the case, she explains in part one, the pressures the parties were put through when they married across the color line. Decided almost 100 years ago, the case arose in a time when social boundaries between the black and white races were more fixed, and whites who married interracially faced far greater criticism and ostracism. Kip Rhineland, the son of a socially prominent and wealthy white New Rochelle family, claimed that his wife Alice, a working class mixed-race black woman, duped him into marrying her by identifying as white. He alleged that had he known her father was of black descent, he would have never married her. A tragedy all around, he lost the case; the jury did not believe he had no idea of his wife's race, and then he lost his marriage. Divorce was the only option available to them after the trial that tore them apart. Upon losing his marriage, he never married again, but lived as a recluse, cut off from his social class, only to die several years after the trial. Alice never married again, but she lived until 1989, only to use her married name on her tombstone: Alice J. Rhinelander.

The second part of the book assesses the issues raised in the Rhineland case, but asks them in the context of modern day mixed-race families: questions of acceptance by relatives; reactions from friends, colleagues, and strangers. This section's strength can be found in its reliance upon information provided by the author herself, as a black woman married to a white man, and from others: surveys and interviews with black-white mixed-race couples, both heterosexual and homosexual. Evidence is presented from black women married to white men, black men married to white women, black lesbians partnered with white women, and black gay men partnered with white men. These modern day mixed-race couples explain how they navigate a world where their relationships are rare and still raise much social concern. They experience racial discrimination.

The reader discovers that the Rhinelanders' world is not that much different from the world of black-white mixed-race couples today. Greater integration in modern day society has meant improvements in race relations, and thus the annulment type of action of the Rhinelanders' day is archaic. Nevertheless, negative sentiments can persist, as the typical family is seen as monoracial. Described as "micro-aggressions," these mixed-race families are constantly reminded that they are different: strangers might watch them in surprise or shock and make inappropriate comments. Others respond with prurient interest, as their relationships can be seen as merely sexual. Employees in restaurants and stores cannot believe they are a couple. Strangers question whether their children are their own and might call the police as a result. The white member of a mixed-race couple begins to experience

race in different ways: partnering with a black person can still mean loss of white racial privileges. The black partner is often seen by other blacks as a sell-out, dedicated to white interests over their own racial loyalties.

Ounwuachi-Willig offers an important discussion of modern anti-discrimination law in the housing and employment contexts, as she explains how each body of doctrine impacts where mixed-race families might live, and whether they might provide for their families. Yet, each type of anti-discrimination law has limitations in their ability to protect rights. She thus urges a newer conceptualization of the doctrines, in the form of "interraciality." This reformulation of race would force courts to recognize the unique and important impacts of racism upon black-white mixed-race couples. However, this section is one that might have been more developed, an explanation of how "interraciality" might work in practice. As it is found toward the end of the book and nearer to the conclusion, "interraciality" poses a challenge to the reader, and perhaps other scholars, to build upon Ounwachi-Willig's work.