

# Queensland's Criminal Justice System and Homosexuality, 1860–1954

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Contemporary Queensland has a flourishing GLBTIQ (gay, lesbian, bisexual, transgender, intersex and queer) scene which, although still suffering from discrimination in a society that is premised around a heterosexual norm, is a far cry from the years before 1990 when male homosexuality was a criminal offence. The queer generation has largely moved beyond binaries in gender and sexuality, and at dance parties there is a blending of cultures that knows few of the old boundaries. These new freedoms to express sexuality mean that relationships develop more easily with less fear of opprobrium. Classified advertisements in newspapers and on the internet, sex-on-premises venues and cybersex are all available to facilitate physical desires and as ways of meeting a possible future partner. Yet if one were to survey young gay men today, how many would know that between 1900 and 1990 a sodomy conviction could carry a prison sentence of up to 14 years with hard labour? Or that engaging in 'gross indecency' in public or private (usually oral sex or masturbation) could receive three years with hard labour? How many would know that the death penalty for sodomy was removed in 1865 or that between that year and 1899 the sentence for anal intercourse was 10 years to life imprisonment?<sup>1</sup>

There is, however, an older group in the GLBTIQ community whose members remain well aware of the once-criminalised nature of this aspect of male sexuality, the police entrapment that occurred, the pseudo-medical cures and the moral pressure they once faced. They represent a living history of the changed environment and can remember the last prosecutions in 1988, when a man in Roma was charged with 40 counts of carnal knowledge against the order of nature and gross indecency. Four others were also charged and, although the cases were eventually dropped, it was not before one of the men had attempted suicide.<sup>2</sup> Nevertheless, even they would be surprised by the findings of research into the way Queensland's criminal justice system dealt with male homosexuality during its first century.

Until a series of law reforms between the 1970s and 1990s, male homosexual activity was a criminal offence in all Australian jurisdictions and subject to severe penalties. This paper is based on an analysis of 464 cases between 1860 and

1954 from the colony and then state of Queensland. The data from this study are organised by offence and broken down into subcategories relating to the regions of Queensland, time periods, 1860–1900 and 1901–54, the age of the defendant, and the severity of the sentence. Although there is a growing literature on gay issues, large-scale evidence of the treatment of homosexuality by the criminal justice system is rare, and most previous studies have only sampled the cases preserved in criminal justice records. This 95-year span of cases is unique in Australia and unusually detailed by any standards.

The evidence indicates that the police carefully chose the possible range of charges to ensure convictions, targeted various age groups, manipulated the evidence, and tried to control the emerging gay subculture. However, the sentences — although still severe — were lenient within the possible range, and show that the judges were aware that male homosexuality was not such an ‘abominable crime’. During the twentieth century, the legal system attempted to understand homosexuality and moderated sentences accordingly. The findings help locate the timing of the emergence of the modern Australian male homosexual, when erotic categories are reorganised, gender and gender roles lose significance for categorising sexual acts, and sexual object choice becomes detached from gender identity, allowing men to be homosexual while maintaining normative behaviour patterns.

## Homosexual Offences and the Criminal Law in Queensland

Before delving into any analysis of homosexual offences, it is important to outline the law as it applied to male-to-male sexual activity. The periods of this study were defined by two major Acts of Parliament, one spanning the years 1865 to 1900 and the other operating from 1901 to 1954 (the cut-off date for this study) and beyond to 1990. Like all British colonies, Queensland took its lead from English law. In 1861, the Imperial *Offences Against the Person Act*<sup>3</sup> abolished the death penalty for anal intercourse with a human or animal (termed ‘buggery’ in the Act), and introduced the new crime of intention to commit anal intercourse.<sup>4</sup> Taking its lead from the British Act, Queensland soon followed, and passed legislation entitled *An Act to Consolidate and Amend the Statute Law of Queensland Relating to Offences Against the Person* in September 1865 (hereafter the 1865 Act).<sup>5</sup> The relevant clauses of the 1865 Act are Sections 62 to 64, gathered under the heading ‘Unnatural Offences’. Essentially, the Act contained provisions to punish three homosexual offences: the ‘abominable crime of buggery’ (with either human or animal); any ‘attempt to commit the said abominable crime’;<sup>6</sup> and indecent assault. These three sections regulated male-to-male sexual activity until the end of the colonial period and remained in force until the Queensland Criminal Code was implemented in 1901.

Back in England, the 1861 *Offences Against the Person Act* was indirectly supplemented in 1885, when an Act to protect women and children and suppress brothels was amended to include the so-called Labouchere clause, which stated:

Any male person who, in public or private, commits, or is a party to the commission of, or procures or attempts to procure, the commission by any male person of, any act of gross indecency with another male person, shall be guilty of a misdemeanour, and being convicted thereof shall be liable at the discretion of the court to be imprisoned for any term not exceeding two years, with or without hard labour.<sup>7</sup>

This amendment is often taken as evidence that law-makers were aware that a homosexual subculture existed in London and other British cities, but Henry Labouchere seems to have been trying to derail other amendments to the Act by showing that they were just as absurd as any attempt to police his amendment.<sup>8</sup> Inadvertently, the new law also assisted attempts at blackmail and was used in 1895 to convict Oscar Wilde on the evidence of male prostitutes acting as police informers. Whatever Labouchere's reason for proposing the addition to the Act, despite the usual flow on of similar British Acts to the colonial legislatures, the clause was not immediately adopted in Australia. In 1891, when Queensland passed its version of the 1885 British Act, Labouchere's amendment was excluded. The reason for this exclusion is unknown, but the clause was eventually included as 'Indecent Practices between Males' in the 1899 revision of the Queensland Criminal Code.<sup>9</sup>

In 1899, the Governor of Queensland assented to *An Act to Establish a Code of Criminal Law* (hereafter the 1899 Act), which became operative from the first day of January 1901.<sup>10</sup> Sir Samuel Walker Griffith, a Welsh-born Queensland politician and legal expert, wrote this Act.<sup>11</sup> Elected to the Legislative Assembly in 1872, and a member of Cabinet from 1874, Griffith was Premier during 1883–88 and 1890–93,<sup>12</sup> when he became Chief Justice of Queensland, and finally Chief Justice of Australia between 1903 and 1919. In the late 1890s, Griffith set himself the ambitious task of rationalising the criminal code in all its particulars, including male-to-male sexual activity. The code as it appeared in legislative form contained four sections, 208–11, relating to male-to-male sexuality. Sections 208 and 209 closely resembled those pertaining to anal intercourse in the previous legislation, although the sentences were reduced. Section 208 dealt with anal intercourse: a guilty verdict under this section delivered a prison sentence of up to 14 years with hard labour. Section 209 allowed for a sentence of up to seven years with hard labour for any attempt to commit such an act. Section 210 specified a prison term of up to seven years with hard labour to punish the 'Indecent Treatment of Boys under Fourteen'. Section 211 covered the offence of 'Indecent Practices Between Males' and provided for the conviction of acts of 'gross indecency' perpetrated either in public or private, which usually meant oral sex or masturbation. The offence was deemed a misdemeanour with a possible sentence of up to three years' imprisonment, with hard labour. These laws remained in force until 1990 when a Labor government replaced a conservative government that had held power since 1957. Even so, the gay political lobby still had to embarrass the new government into honouring its reform commitments.<sup>13</sup>

## Overall Findings

Searches in the Queensland State Archives revealed 548 male-to-male sex court cases and 464 convictions over 95 years, 1860 to 1954.<sup>14</sup> As a new criminal code was adopted from 1900, the period falls neatly into two halves. The 1954 cut-off is due to archive access policy when the data were gathered during the early 1990s, but it is late enough to be within living memory, and certainly the modern GLBTIQ community had begun to form by the 1950s. The data provide a bridge from the colonial years to the modern scene. Although there is a growing literature on gay issues, large-scale evidence of the treatment of homosexuality by the criminal justice system is rare, and most previous studies have only sampled the cases preserved in criminal justice records.

The defendant's chances of acquittal were poor: just over 70 per cent of those facing prosecution between 1860 and 1954 were found guilty.<sup>15</sup> The anal intercourse convictions are markedly higher in the colonial period (54 per cent) than during the twentieth century (22 per cent). Figure 1 also shows that categories available for charges between 1860 and 1900 were much simpler than in the later period: there are only two charges — anal intercourse and attempted anal intercourse (46 per cent). The difference in percentages is not extreme, particularly when compared with the same division between 1901 and 1954, which shows quite marked differences between convictions for the same two charges. Figure 2 (1901–54) shows the expanded range of charges possible under the 1899 Act. Of the total convictions after 1901, only 22 per cent were for anal intercourse, and 6 per cent were for attempted anal intercourse. The most likely explanation for this is that, until the 1899 Act added extra categories, the same categories had been subsumed in 'attempted buggery' charges under the 1865 Act or, following the English pattern mentioned above, were dealt with as misdemeanours. The new charge of 'Indecent Practices between Males' (the 1885 Labouchere amendment), which was introduced with the 1899 Act, became the most deployed of all charges in the twentieth century, accounting for 34 per cent of convictions. Little chance of acquittal followed trial, and the conviction rate rose onwards from 1941. The Section entitled 'Indecent Treatment of Boys under Fourteen' was also a feature of the 1899 Act, accounting for 28 per cent of all convictions up to 1954. After 'Indecent Practices between Males', anal intercourse was the next most used charge, and offenders faced a high probability of being found guilty if taken to trial. There is also a minor category in Figure 2 labelled 'Unnatural Offences'. Section 208 of the Act, dealing with anal intercourse, is headed 'Unnatural Offences'. Three per cent of the offences with sentences recorded were listed only as 'Unnatural Offences'. Although these cases probably involved anal intercourse, we chose to list them separately. It seems probable that this 3 per cent should be added to the anal intercourse percentage and that the figure was really closer to 25 per cent.

The divorce of bestiality from male-to-male anal intercourse is indicative of the end of old definitions of sodomy that extended to all forms of non-procreative sexual activity, including sex with animals. The diversification of categories and sentences under the 1899 Act indicates an increased understanding of the physical

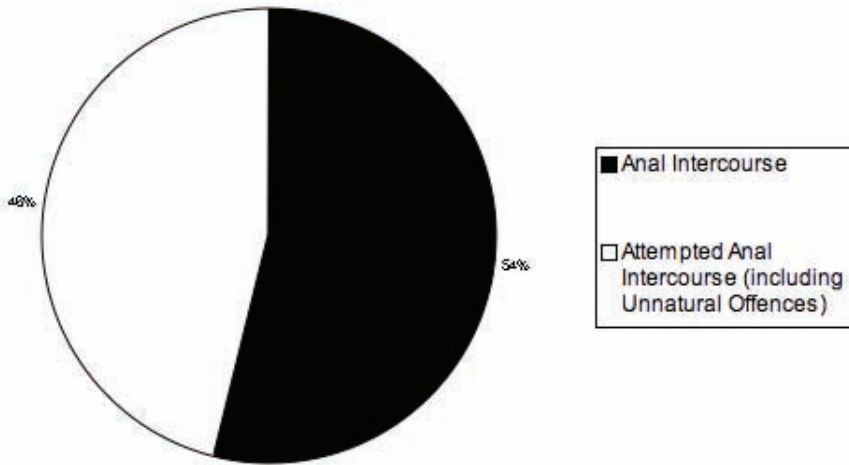


Figure 1: Percentage of offences committed 1860–1900

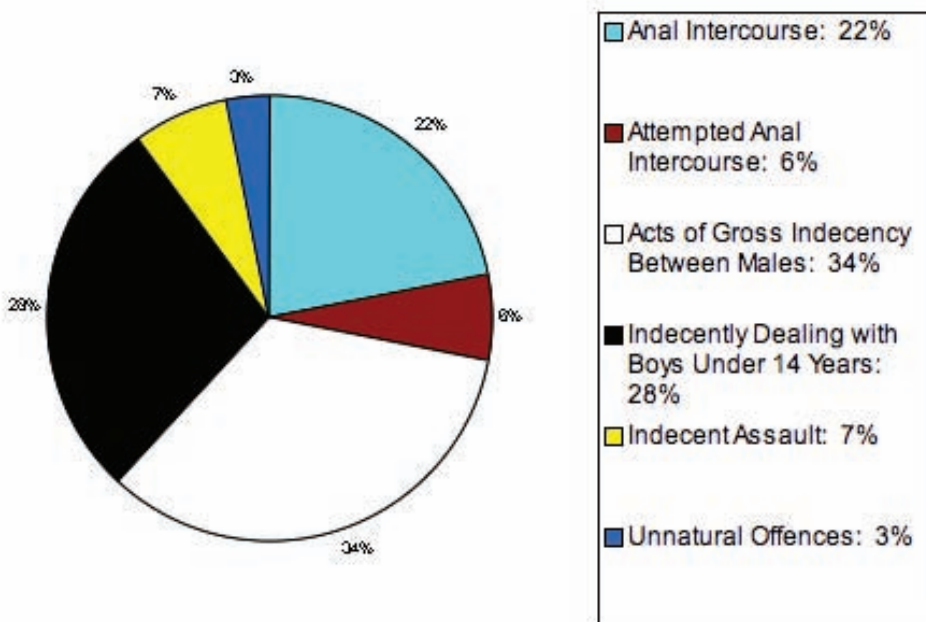


Figure 2: Percentage of offences committed 1901–54

nature of male homosexuality. The data also show that, particularly by the 1940s and early 1950s, a number of the men found guilty no longer received prison sentences. Over the first 40 years of the twentieth century, 4 per cent of sentences were either suspended or a monetary fine was imposed, whereas between 1941 and 1954 the number of sentences not involving imprisonment rose to 24 per cent, mostly juvenile offenders. Male-to-male sexual activity gradually became understood as a sexual identity, with strong condemnation reserved only for adult males involved with minors.<sup>16</sup>

The ‘Indecent Assault’ category was also available to police charging male-to-male sexual offences, but in the archival files these charges are conflated with heterosexual charges, and although we have calculated this category as 7 per cent of the total charges, the number was possibly even higher. Deployment of a wider range of charges during the twentieth century cuts two ways: police were more likely to ensure a conviction, but this also usually resulted in a lower level sentence. At a legislative level, a comparison of the two Acts reveals a ‘softening’ of the sentence for male-to-male sexual activity. The reduction in the permissible maximum sentence is evidence of an increasingly ‘tolerant’ attitude by the legal arm of the government, and perhaps acknowledgment of relaxation of broader community opinion, except when it came to sex with boys. The new concentration on youthful offenders is also an indication of interest in child protection, which became more pronounced through government and community institutions as the twentieth century progressed.<sup>17</sup>

The findings of this research are sometimes surprising, and raise questions that are not always easy to answer. One of the most unexpected conclusions of this study is that the full severity of the law was seldom enforced, and evidence from early New South Wales and Queensland before separation suggests that as far back as the 1840s and 1850s sodomy sentences were usually lower than the minimum specified in law.<sup>18</sup> Despite the constant invective about ‘abomination’, the judges’ sentences were moderate, within the possible range of severity. The only conviction that always received a heavy punishment was for paedophilia, and generally there is a pattern of obvious bias against older offenders in all categories. Motivations to employ ‘No True Bill’ (where the Crown chose not to proceed after committal for trial but before the case reached the court) and *Nolle Prosequi* (where the prosecutor agreed to proceed no further after the trial had commenced) are not clear, but presumably there was a great deal of behind-the-scenes bargaining to have cases processed using these procedures, as well as genuine police decisions that there was not enough evidence to proceed.

Comparison between homosexual offences and any other categories of criminal offences is difficult and not terribly rewarding. The closest Queensland comparison available is Yorick Smaal’s unpublished statistics on rape and attempted rape cases between 1890 and 1915. There is, however, a considerable difference between rape and attempted rape — largely non-consensual acts by men against women, and crimes related more to power relations than to sexual desire — and homosexual offences. While some of the homosexual cases may also have involved rape or involuntary participation, there is no evidence to support this. Accepting these

differences, generally the rape and attempted rape sentences are heavier than those for anal intercourse and attempted anal intercourse. This may indicate that society regarded rape as a more serious offence than homosexual activity. There were 25 rape charges from 1890 to 1900: 11 guilty verdicts were delivered; there were seven death sentences, one of which was commuted; and other sentences varied between 10 and two years with hard labour. Between 1901 and 1915, there were 56 rape charges: in 27 cases guilty sentences were delivered with an average sentence of six years, almost all with hard labour. Between 1890 and 1900 there were 21 attempted rape charges: 11 guilty verdicts were delivered; the average sentence was two years and 10 months, and eight of the sentences included hard labour. There were 37 attempted rape charges between 1901 and 1915, with 32 guilty verdicts; the average sentence length was two years, almost all with hard labour.<sup>19</sup>

Charges seem sometimes to have been laid to frighten and intimidate men who were probably involved in homosexual activity, even when the police realised that they could never secure a conviction. Actually proving that anal penetration had occurred was very difficult, even with an eyewitness to the event, or subsequent medical examination, which indicates that the police probably often perjured themselves and the courts accepted their shoddy evidence. The police seem to have chosen their charges carefully and have targeted certain groups with particular charges, which in the twentieth century probably relates to attempts at policing the growing homosexual subculture.

There is no indication that the laws were used more severely against non-Europeans. There are around 10 cases of prosecutions of Asians during the colonial period, but they also received 'No True Bill' and *Nolle Prosequi* decisions, and sentences are no higher than for other offenders. Particularly in the nineteenth century, there are short spates of cases involving Asians and Melanesians, which seem to relate to local or individual agendas and soon pass. No Asians appear in the records after 1944, and Australian Aborigines appear only twice, once as a witness in 1894 and the other as an under-age partner in 1906.<sup>20</sup>

Exactly how lawyers and legislators came to their realisation of the nature of male homosexual acts and that a subculture existed is difficult to divine. For example, English law was reformed by the *Criminal Law Amendment Act*,<sup>21</sup> which included the Labouchere amendment in 1885, which added 'Gross Indecency with Another Male Person' as a misdemeanour carrying a sentence of up to two years, with or without hard labour. This is usually taken as evidence that law-makers were aware a homosexual subculture existed in London and other large British cities, although it may be that Labouchere was trying to derail other amendments to the Act by showing they were impossible to police. The same Act was introduced in Queensland in 1891. It is unclear why the Labouchere amendment was deliberately removed from Queensland's 1891 version of the British 1885 Act but included in the 1899 Act, or why it was introduced decades later in other Australian jurisdictions. The 1899 Act divided male-to-male sexual activity into several categories which, although they still carried severe sentences, showed that Samuel Griffith, the lawyer and politician who redrafted the laws, was aware of

the diverse nature of the physical side of male sexuality. But he continued to link homosexuality and bestiality in his revised legislation, which shows that his thinking was not truly modern.

## **Sex and Gender Categories**

Another question concerns the formation of gender and sexual categories. Historian David Halperin suggests that there were four pre-homosexual categories of male sex and sexual deviance which we can discern as discourses: effeminacy; pederasty or 'active' sodomy; friendship or male love; and passivity or inversion. In earlier discourse, only one of the partners is referred to — the 'active' partner in sodomy and the effeminate male or masculine female in cases of 'inversion'. The term 'homosexual' applies to both partners, whether active or passive, and to quote Halperin, homosexuality 'implies that same-sex sexual feeling and expression, in all their many forms, constitute a single thing, called "homosexuality", which can be thought of as a single integrated phenomenon, distinct and separate from "heterosexuality"'.<sup>22</sup> Halperin and others argue that once homosexuality became established as both a concept and a social practice, erotic organisation was reorganised and gender and gender roles lost significance for categorising sexual acts. Sexual object choice becomes detached from gender identity and men and women can be 'homosexual' while maintaining normative behaviour.

Historians believe that the Western homosexual subculture developed historically from its probable origins in the eighteenth century 'Molly houses' into a gay urban scene from the 1890s onwards. Brisbane had a discernable middle-class same-sex community in the 1920s and 1930s, which held house parties and occasionally drew unwanted attention from the more scurrilous parts of the media.<sup>23</sup> While this was embryonic compared with Chauncey's 'gay world' of New York in the 1930s, the timing mirrors the American urban pattern. During World War II, Queensland became a major Allied base, causing large-scale social disruption which, in the same way as occurred in the United States, inadvertently furthered the development of what became a flourishing gay and lesbian scene.<sup>24</sup> Brisbane and several other coastal cities became military garrison towns, promoting sexual liberation and excesses of all types. After the war and in the early Cold War years, forces of repression were unleashed, partly as a local attempt to return Queensland to a more 'moral' society but also as part of international forces, which served to inhibit public expression of the gay subculture.<sup>25</sup> At the same time, overwhelming demographic, medical and legal changes were moving towards creating a more liberal society. Initially allied to the bohemian subculture, the 'camp' (the common 1950s and 1960s Australian word for gay) subculture began to draw apart, developing a separate social scene, although this did not become politicised until the 1970s.<sup>26</sup>

During the period in which a homosexual subculture developed in Queensland, medical and legal experts were developing a better understanding of homosexuality, and society slowly moved towards an acceptance of different sexual values and desires. There was also an acknowledgment through the courts that sentencing



should be compassionate, at the lower end of the scale, and increasingly involve suspended sentences and monetary punishments. Chauncey argues that hetero-homosexual binarism is a relatively recent development, and that in New York it dates from the middle of the twentieth century.<sup>27</sup> Earlier, there were clearly ‘inverted’ effeminate men, and men who involved themselves in same-sex activities without necessarily being part of a subculture. In Queensland, the development of male homosexuals who maintained normative appearances but were identifiable as part of the subculture did not occur until the 1960s and 1970s. The time difference is to be expected: Queensland was largely rural, the state had a conservative repressive government, and until the 1970s Brisbane, the capital, was often described as a large country town.

Acceptance of homosexuality and acknowledgment of a subculture by the general public were much slower than acknowledgment by legal and medical authorities. Conservative politicians, right-wing Christians and sections of the media maintained a reactionary moral stand through public rhetoric right up until decriminalisation occurred in 1990, and indeed beyond until the present day. Like so many other aspects of the justice system when it touches on individual choice — for instance, the possession of marijuana, or prostitution and abortion — the letter of the law was not always fully observed, even in situations when ‘abominable’ acts were supposed to be against the moral orthodoxy of the majority.

## Notes

- 1 *An Act to Consolidate and Amend the Statute Law of Queensland Relating to Offences Against the Person*, 29 Vic. No. 11 [1865]; *An Act to Establish a Code of Criminal Law* of 1899, 63 Vic. No. 9.
- 2 Clive Moore, *Sunshine and Rainbows: The Development of Gay and Lesbian Culture in Queensland* (St Lucia: University of Queensland Press, 2001), 284.
- 3 *Offences Against the Person Act* 1861, 24/25 Vic. 100 cl. 61. Minor forms of homosexuality were regarded as a statutory offence under 24/25 Vic. C 100, cl. 62.
- 4 Only five Queensland cases were found from 1860 to 1865 under the old legislation. Two were for sodomy of a male, one for sodomy of a woman, and two for attempted sodomy of males. Only two sentences are extant, two years with hard labour and a death sentence for sodomy of the woman, which was commuted, the length of the eventual sentence unknown.
- 5 *An Act to Consolidate and Amend the Statute Law of Queensland Relating to Offences Against the Person*.
- 6 For the charge of carnal knowledge to be successful, penetration had to be proven.
- 7 This was the ‘Outrage on Decency,’ Section 11 of the *Criminal Law Amendment Act* 1885, relating to protection of women and girls, and the suppression of brothels.
- 8 F.B. Smith, ‘Labouchere’s Amendment to the Criminal Law Amendment Bill’, *Historical Studies* 17(67) (1976): 165–75.
- 9 See Queensland’s *Criminal Law Amendment Act* of 1891, 55 Vic. No. 24 [1891] and *Criminal Code Act* of 1899, Clause 211. The Labouchere amendment took even longer to be adopted in other Australian jurisdictions — for instance, not until 1919 in the State of Victoria. Adam Carr, ‘Policing the “Abominable Crime” in Nineteenth Century Victoria’, in David L. Phillips and Graham Willett (eds), *Australia’s Homosexual Histories: Gay and Lesbian Perspectives V* (Sydney and Melbourne: Australian Centre for Lesbian and Gay Research and the Australian Lesbian and Gay Archives, 2000), 38–39.

- 10 *Criminal Code Act* of 1899.
- 11 Roger B. Joyce, *Samuel Walker Griffith* (St Lucia: University of Queensland Press, 1984).
- 12 The terms used at the time were usually Colonial Secretary or Chief Secretary, whereas Premier is the modern-day equivalent title. Refer to Joanne Scott, Ross Laurie, Bronwyn Stevens and Patrick Weller, *The Engine of Government: The Queensland Premier's Department, 1859–2001* (St Lucia: University of Queensland Press, 2001).
- 13 Graham Willett, 'And the Last Shall be First: Law Reform in Queensland, Western Australia and Tasmania', in *Living Out Loud: A History of Gay and Lesbian Activism in Australia* (Sydney: Allen & Unwin, 2000), 219–38; Clive Moore, 'Gay Liberation, Law Reform and HIV/AIDS, 1970s–1980s', in *Sunshine and Rainbows*, 161–89.
- 14 A more extensive version of this paper has been published: see Clive Moore and Bryan Jamison, 'Making the Modern Australian Homosexual Male: Queensland's Criminal Justice System and Homosexual Offences, 1860–1954', *Crime, History & Societies* 11(1) (2007): 27–54.
- 15 Twenty-seven per cent were found not guilty and in 3 per cent of cases we could not establish a verdict.
- 16 Such sentences covered monetary fines, suspended sentences, being placed into state care, probation, medical treatment and release under their own recognisance. On occasion, a combination of two or more of the above constituted a sentence.
- 17 L. Goldman, *Child Welfare in Nineteenth Century Queensland, 1865–1911*, MQual thesis, Department of History, University of Queensland, 1978; G.M. Schofield, *An Overview of the Methods of State Child Care in Queensland, 1864–1965*, BSoc. Work thesis, University of Queensland, 1971.
- 18 There is no record of executions for sodomy in Queensland between 1814 and 1859, while the colony was still part of New South Wales, and none from 1859 to 1865 before capital punishment for the offence was removed from the statutes. This follows the pattern in Britain during the same period. Michael Sturma, *Vice in a Vicious Society: Crime and Convicts in Mid-Nineteenth Century New South Wales* (St Lucia: University of Queensland Press, 1983); R. Barber, 'Capital Punishment in Queensland', BA Hons thesis, Department of Government, University of Queensland, 1967; C. Emsley, *Crime and Society in England, 1750–1900* (London & New York: Longman, 1996).
- 19 I am indebted to Yorick Smaal for providing these statistics.
- 20 Moore, *Sunshine and Rainbows*, 51–59.
- 21 Clause 11.
- 22 D.M. Halperin, 'How to Do the History of Male Homosexuality', *GLQ: A Journal of Lesbian and Gay Studies* 6(1) (2000): 110.
- 23 Moore, *Sunshine and Rainbows*, 93–94, 98–100.
- 24 A. Berube, 'Marching to a Different Drummer: Lesbian and Gay GIs in World War II', in A. Snitow, C. Stansell, C. and S. Thompson (eds), *Powers of Desire: The Politics of Sexuality* (New York: Monthly Review Press, c. 1983), 88–99; and A. Berube, *Coming Out Under Fire: The History of Gay Men and Women in World War II* (New York: Free Press, 1990).
- 25 Graham Willett, 'The Darkest Decade: Homophobia in 1950s Australia', *Australian Historical Studies* 109 (1997): 120–32; Garry Wotherspoon, 'This Nest of Perverts': *Policing Male Homosexuality in Cold War Australia*, Working Papers in Australian Studies, No. 32 (London: Sir Robert Menzies Centre for Australian Studies, 1990); Garry Wotherspoon, 'City of the Plain': *History of a Gay Sub-Culture* (Sydney: Hale & Iremonger, 1991), 109–38.
- 26 Graham Willett, *Living Out Loud: A History of Gay and Lesbian Activism in Australia* (Sydney: Allen & Unwin, 2000).
- 27 George Chauncey, *Gay New York: Gender, Urban Culture, and the Making of the Gay Male World, 1890–1940* (New York: Basic Books, 1994), 1–13, 385, n 2.