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## Filming Eugenics: Teaching the History of Eugenics Through Film

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### **Recommended** Citation

Ooten, Melissa, and Sarah Trembanis. "Filming Eugenics: Teaching the History of Eugenics through Film." *The Public Historian* 29, no. 3 (Summer 2007): 145-55. doi:10.1525/tph.2007.29.3.145.

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# Filming Eugenics: Teaching the History of Eugenics Through Film

MELISSA OOTEN and SARAH TREMBANIS

**Abstract:** In teaching eugenics to undergraduate students and general public audiences, film should be considered as a provocative and fruitful medium that can generate important discussions about the intersections among eugenics, gender, class, race, and sexuality. This paper considers the use of two films, *A Bill of Divorcement* and *The Lynchburg Story*, as pedagogical tools for the history of eugenics. The authors provide background information on the films and suggestions for using the films to foster an active engagement with the historical eugenics movement.

Key words: The Lynchburg Story, Bill of Divorcement, eugenics, film, teaching

IN OUR EXPERIENCE SHOWING *The Lynchburg Story*, a documentary about Virginia's eugenic sterilization program, to university students for over half a decade, we have been frequently confronted and continually surprised by students' complete lack of knowledge about the eugenic legacy of the state of Virginia and the United States more broadly. They readily associate such programs with Germany under the leadership of Adolf Hitler, but express surprise and dismay that Hitler looked to the U.S., and Virginia in particular, to provide a model for his implementation of eugenic policies, particularly sterilization of the "unfit." Attempting to correct this pervasive misperception, we find that the screening of eugenics-themed films engages viewers in

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*The Public Historian*, Vol. 29, No. 3, pp. 145–55 (Summer 2007). ISSN: 0272-3433, electronic ISSN 1533-8576.

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http://www.ucpressjournals.com/reprintInfo.asp. DOI: 10.1525/tph.2007.29.3.145.

the complex history of eugenics in a manner that is especially beneficial to reshaping the public memory of American eugenics.

The medium of film serves as a particularly potent site for the study of eugenics for several reasons. In this age of omnipresent popular media, many individuals are astute readers of visual culture. Thus, analyzing the history of eugenics through film provides unique opportunities to address ways in which stereotypical representations of class, race, and gender-based characteristics become visualized on-screen. Beyond the interpretation of screen images, the larger contextual history of particular films can also serve as a useful platform for the discussion of eugenics. According to historian Martin Pernick, motion pictures served as an early way to bridge conversations between professionals touting eugenics in the 1910s and beyond and a public seeking more information on hereditary maladies.<sup>1</sup> Yet particularly in the first half of the twentieth century, local and state censors often banned films containing eugenic content for a variety of reasons, thus limiting the scope of how effective the medium of film could be in generating a public discourse around the politics of eugenics.<sup>2</sup>

Through an examination of these histories of film censorship and viewing, interested parties can gain a nuanced understanding of the intersections between government regulation and the cultural (and filmic) expression of sexuality and reproduction. In Virginia, for example, this combination coalesced in the 1920s when, within two years and in tandem with one another, state representatives passed a bill to censor movies, a law to restrict who could claim the privileges of "whiteness" within the state, and a statute allowing the forced sterilization of some of the state's most destitute and least privileged citizens.<sup>3</sup> These laws empowered state regulators to police the boundaries of race, class, gender, and sexuality within Virginia in a manner that supported the eugenic ideology of racial fitness, for eugenics encompassed a range of issues including constructions of deviant sexuality, promiscuity, and biological deterioration.<sup>4</sup>

Film creates an avenue through which to galvanize public discussions of eugenics outside of an academic classroom. Film screenings, coupled with a discussion of the historical framework and cinematic analysis, provide opportunities to bring the history of eugenics to the public in a manner which is likely to gain more attendance and attention than a public lecture alone may garner. Film provides the starting point for discussion, and it can be broadened to speak more specifically to the history of eugenics in more localized

4. Alexandra Stern, Eugenic Nation: Faults and Frontiers of Better Breeding in Modern America (Berkeley: University of California Press, 2005), 11.

<sup>1.</sup> Martin Pernick, The Black Stork: Eugenics and the Death of "Defective" Babies in American Medicine and Motion Pictures Since 1915 (New York: Oxford University Press, 1996), 122.

<sup>2.</sup> According to Martin Pernick, frequent viewer repulsion toward cinematic portrayals of eugenic-based plotlines in motion pictures caused censors to ban films with this content not only on the basis of sexual immorality but also for aesthetic reasons. Pernick, *The Black Stork*, 119.

<sup>3.</sup> These acts were the Motion Picture Censorship Act (1922), the Racial Integrity Act of 1924, and the Sterilization Statute (1924). *Virginia Acts of Assembly*, 1922 and 1924.

contexts. Films do not, however, function simply as a passive impartment of knowledge from the film producer or director to the viewer. As Pernick notes, even early consumers of films with eugenics-based themes read their own meanings into the images they viewed on-screen.<sup>5</sup>

Using film to discuss eugenics offers a unique means to bridge academic and community spaces in order to talk about the legacies of eugenics. Film also allows for discussion of privileged, visible histories, as opposed to more "invisible" histories. As a teaching method, film problematizes eugenics in multiple ways. Filmmakers must depict class and race in a way that aligns with the expectations of their contemporary audiences. Characters in dramas and even the experiences of actual survivors in documentaries must somehow be marked to "adequately" express or convey their backgrounds.<sup>6</sup> Although college-aged viewers of film are often astute readers of visual culture, having grown up surrounded by a steady stream of television, movies, Internet, and a general inundation of media, they frequently struggle when asked to examine more than just the cinematic action. Through close questioning, we have found that students begin to interrogate other significant choices made by the filmmakers and documentary subjects. Thus, students and other observers begin to contextualize the "look" of the characters and how class, race, and sexuality are depicted visually on-screen and eventually deconstruct these meanings.

This article focuses on ways in which the history of eugenics, and continued controversies surrounding technology and eugenic methods, can be taught both in academia and in the broader community through the medium of film. We discuss two films, a feature film, *A Bill of Divorcement* (1932), and a documentary, *The Lynchburg Story* (1993), that can be used to problematize the history of eugenics in multiple ways. This paper will also address the particular benefits and potential problems of teaching eugenics through film and will suggest ways to broaden community and classroom discussions from each film's particular historical and cultural moment to a more inclusive discussion of eugenics.

### The Lynchburg Story (1993)<sup>7</sup>

Despite its local focus on Virginia, *The Lynchburg Story* provides a particularly compelling forum for bridging classroom and community discussion. Virginia's sterilization law applied to five facilities for the mentally "unfit," and *The Lynchburg Story* focuses on a few of the stories and voices to emerge from the Lynchburg Colony for the Epileptic and Feebleminded. The docu-

<sup>5.</sup> Pernick, The Black Stork, 14.

<sup>6.</sup> It is this subjective attempt to portray certain individuals within certain boundaries of race, ethnicity, and class that often allows individuals to interpret films differently since audience members will interpret who is at fault and why in a variety of different ways.

<sup>7.</sup> *The Lynchburg Story* is a Worldview Pictures Production produced by Bruce Eadie and directed by Stephen Trombley.

mentary intersperses interviews with Virginia residents who were sterilized under the law with present-day officials and with interviews and dramatic readings from the writings of those who worked to enforce or promote the bill at the time. Through this rich combination of archival sources and oral history, a powerful visual history emerges, which shows film viewers not only personal dimensions of the people persecuted under these laws and classified as mentally "unfit," but also the public reasoning of those who promoted eugenics and eugenic sterilizations.

By focusing on one ACLU lawyer, Jenny Crockett, students and community members view the film as an activist tool for linking present and past. It begins a discussion on how state and federal governments can—or cannot appropriately redress past wrongs.<sup>8</sup> Viewers begin to question what is at stake for governments issuing apologies, the potential effects of monetary compensation, and how these debates play out for those victimized under these state-sanctioned policies. Moreover, Crockett serves as a guide for the audience. In a documentary that features older men and women who at times can be difficult for the traditional-age college student to understand, Crockett connects with the viewer. It is her quest for justice for eugenic victims that centers the film and drives the plot.<sup>9</sup> Students and viewers are prompted to think critically about the choices made by the documentary filmmakers as they shaped and focused the narrative thrust of *The Lynchburg Story*.

Virginia's eugenic sterilization law, upheld by the U.S. Supreme Court in 1927 in *Buck v. Bell*, became a model for other states and the prototype for Germany under the reign of Hitler. *Buck v. Bell* upheld the constitutionality of Virginia's forced sterilization of eighteen-year-old Carrie Buck under the report of Albert Priddy, superintendent of the Virginia State Colony for the Epileptic and Feebleminded, that Buck was mentally retarded.<sup>10</sup> The resulting statute allowed for compulsory sterilization of the "feebleminded" for the safety and health of the state. According to legal scholar and bioethicist Paul Lombardo, this ruling allowed a small group of experts to publicly enact their private prejudices and established a "landmark in the endorsement of intrusive procedures as tools to be used for state ends."<sup>11</sup> In 2002, the then-governor of Virginia, Mark Warner, apologized for the state's eugenic legacy, be-

8. While Virginia's governor Mark Warner apologized for the state's eugenic policies in 2002, the previous year, the state's General Assembly expressed "profound regret" under the assumption that an apology might hold the state legally liable for past sterilizations. Bioethicist Paul Lombardo notes that such a scenario is unlikely given that *Buck v. Bell* was never overturned.

9. This singular focus on Crockett's activism is also an important point with which to engage the audience. Once we prompt audiences to examine how she is portrayed in the film, viewers are quick to point out how one person alone, often portrayed as the singular heroine or protagonist in melodramas, could not have achieved this change without help from others.

10. In Oliver Wendall Holmes's Supreme Court decision, Buck was reported as the daughter of a "feebleminded" woman and the mother of an "illegitimate feebleminded daughter," thus leading to his now infamous statement that "three generations of imbeciles is enough."

11. Paul Lombardo, "Three Generations, No Imbeciles: New Light on Buck v. Bell" New York University Law Review 30 (1985): 33.

coming the first governor to apologize for historical eugenic policies and practices.<sup>12</sup> In this context, a film that focuses on state policy from the 1920s to the 1970s becomes infused with contemporary politics and forces viewers to grapple with the ethics of how governments should redress past wrongs.

The Lynchburg Story chronicles the history of eugenics in Virginia, but it can be used to open a discussion of any state's eugenic legacy and its presentday ramifications. Moreover, as the Supreme Court upheld Virginia's sterilization law, the particulars of Virginia's eugenics program had ramifications for eugenics law on a national level. Given that Virginia and other states (notably California) selectively sterilized some of its least privileged citizens through the 1970s, community members likely have experience with this topic, in either its historical or more modern forms.<sup>13</sup> Consequently, the documentary's telescopic perspective, one which interweaves the historical story of Virginia eugenics with the 1980s legal fight to compensate the victims of state sterilization policy, challenges students to interrogate both the historical context of eugenics and contemporary legal and policy issues regarding the regulation of reproduction. By addressing how forced sterilization was legally ended in Virginia in the 1980s through the work of many different contingents, and especially lawyers working for the American Civil Liberties Union (ACLU) and disability rights activists, viewers can grapple with the checks and balances of a legal system and how activism can shape public policy.

In our showings of this film, viewers are often bewildered. They associate eugenic policies with Nazi Germany under Hitler, and they are typically quite surprised that the United States, and Virginia in particular, pioneered some of these policies. The fact that the film shows only white victims of the policy often surprises viewers, since they are unaware that government officials were more concerned with how these white Virginians threatened to "pollute" their own race. Most black Virginians were not eligible for welfare assistance under state laws, but some impoverished white Virginians were; thus officials' concern fell more heavily upon white Virginians regarding economic issues.<sup>14</sup> It also surprised some viewers that officials targeted women more than men. Statistics suggest that 60 percent of those individuals sterilized in Virginia were women, due in large part to women's systemic (and often fragile) financial de-

12. USA Today, May 2, 2002. Oregon's Governor John Kitzhaber became the second governor to apologize for Oregon's more than 2,600 sterilizations later in 2002 in response to pressure from mental health advocates, disability rights activists, and sterilization victims. Scholar Alexandra Stern reminds us, however, that such apologies should not be allowed to "close the window" on eugenics as past endeavors that do not deserve contemporary analysis and interrogation. Stern, *Eugenic Nation*, 1, 4.

13. Alexandra Stern notes that the act of "civilizing" a variety of racial and ethnic groups, most notably Mexicans and Mexican Americans, included the application of eugenics under the framework of science. Stern, *Eugenic Nation*, 85.

14. In neighboring North Carolina, however, sterilizations of "unfit" African American women in the 1950s and 1960s rose significantly. Johanna Schoen, *Choice and Coercion: Birth Control, Sterilization, and Abortion in Public Health and Welfare* (Chapel Hill: University of North Carolina Press, 2005). pendence on others and doctors' willingness to declare women "hysterical" and "feebleminded."<sup>15</sup> Finally, it is important to stress class and economic issues, which, while present in the film, are often not in the forefront of viewers' mind. In Virginia, sterilization meant a lessened likelihood that this individual and his or her (now prevented) family would one day need state financial assistance.<sup>16</sup>

*The Lynchburg Story* offers unique ways to discuss issues of sexuality, race, and class. In terms of sexuality, state legislatures that passed forced sterilization bills were concerned foremost with controlling the reproduction of—and the sexual knowledge (most sterilizations were performed on teenagers)—residents of "low" economic class as they would most likely require public assistance to survive. In one interview, a Virginian woman sterilized under the eugenics program recalls being sent to the colony because she was a poor, white woman who was pregnant out of wedlock at a time when pregnant, unwed white women of any class were deemed "pathological" by governmental officials and scientific "experts."<sup>17</sup> Thus, not only was forced sterilization about economic issues and the welfare of state treasuries; it was also about raced and classed constructions of morality. As historian Linda Gordon points out, concern over the dependency of single mothers upon the state was a major influence on modern welfare policy. Indeed, she argues, alarm over single motherhood created the first modern welfare policy in the United States.<sup>18</sup>

In the film, viewers only see the experiences of whites affected by these sterilization laws. Given the history of Virginia and the concurrent passage of the Racial Integrity Act, which declared that because state citizens could only claim whiteness if they had "not one drop" of black blood, race is a fruitful topic for discussion. Although it is not addressed in the film, student viewers are always quick to point out the "whiteness" of the film and ponder the apparent contradictions between racial regulations and eugenic sterilizations. African Americans were also victims of eugenic sterilizations in Virginia, but state officials focused on white citizens because not only were segregation policies firmly in place, but welfare monies often were not available to people of color; there was no economic incentive for the state to single out African-Americans. The film does not discuss the underlying discourse of sexual morality or the racial implications of eugenics, but it prompts these questions in its viewers and further discussion of the role race plays in eugenic policy. When

15. It is also important to note that from the 1920s into the 1950s, officials deemed unwed, pregnant white women as inherently "feebleminded" and characteristic of failings in mental ability. They also were most likely to need state assistance as single women with few to no sufficient job prospects to support themselves and a child.

16. Viewers have often been quick to point out the subjectivity of science and the multitude of morality issues underlying its various applications. At each viewing, at least one person has referenced the use of the atomic bomb in 1945 as an example of the morality issues laden in science.

17. Rickie Solinger, Wake Up Little Susie: Single Pregnancy and Race before Roe v. Wade (New York: Routledge, 1994).

18. Linda Gordon, *Pitied but Not Entitled: Single Mothers and the History of Welfare* (Cambridge: Harvard University Press, 1994), 7.

screening *Lynchburg*, students and viewers should be reminded of the antimiscegenation laws of the time and then asked to consider the implications of eugenics in such a context. We have found it useful to ask students to consider whether eugenic sterilization laws functioned as part of a larger campaign to eliminate miscegenation. Discussion of this topic and a general consensus by students that sterilization laws, especially in Virginia, seemed to be intertwined with miscegenation and racial integrity laws, leads to a critical analysis of the documentary's content. In particular, why did the filmmakers choose not to explore that aspect of Virginia eugenics? Although the ensuing discussion rarely leads to a definitive conclusion, it spurs a deeper evaluation of the documentary as a problematic text in its own right.

There are a number of challenges in teaching eugenics through film. Documentaries and feature films assume a point of view that can leave out salient aspects of a topic. With a documentary such as *The Lynchburg Story*, viewers might absorb the film with no understanding of the racial politics at play either at the time or during the making of the film. Simply viewing the film with its white subjects could "whitewash" the eugenics legacy and render invisible the ideologies of race simultaneously at work. As such, those leading the discussion of the documentary must carefully contextualize the film and push students to look beyond the visible.

Also, class has historically been, and remains, difficult to "read" on-screen. Often, dramatic movies in particular rely on behaviors of characters to mark their class more so than their visual look of poverty, wealth, or middle-class status. Thus a pregnant, unmarried white woman on film in the 1920s or 1930s would most certainly be marked as working-class or poor regardless of her visual appearance. The all-white victims of eugenics depicted in *The Lynchburg Story* are marked most distinctly by their rural, Appalachian accents and their impoverished economic backgrounds.<sup>19</sup>

Many of today's students are familiar with Virginia's legacy of racism and segregation, but it surprises them when the victims are white. Also, the film shows these victims of the state's eugenics policy in their rural homes, which clearly mark them as people with few financial resources. Given the lack of class diversity shown in contemporary mass media outlets, students have little background with which to analyze these images of individuals with few economic resources.<sup>20</sup> We have found that although today's students are often

19. Given the segregation of Virginia at the time, it is not surprising that this initiative focused primarily on white Virginians. Many officials already thought black Virginians were biologically inferior to white Virginians, and thus they were more concerned with white individuals who might "pollute" the white race. Also, Pernick argues that eugenicists were much more concerned with mental disabilities than physical disabilities, thus creating a "hierarchy of handicap," although it is important to note that perhaps their focus tended toward the mental, since physical disabilities were visually obvious, and thus they focused on rendering visible a more "hidden" mental disability. Pernick, *The Black Stork*, 71.

20. For more information on the eugenicist campaigns to equate material wealth with fitness, see Nicole Hahn Rafter, *White Trash: The Eugenic Family Studies*, 1877–1919 (Boston: Northeastern University Press, 1988).

astute analyzers of visual mediums, they are taken aback by this documentary format that is so clearly marked by class.

Students from urban Virginia and outside of the state often remark that they cannot understand the accents of those from south and southwestern Virginia, regions historically marked by their isolation and poverty, and often stereotyped among majority populations as "backward." Students often feel discomfort with seeing an "other" that so greatly varies from the homogenized caricatures that they most frequently see.

Discussing eugenics through film necessitates a focus on how to read visual texts and the markers established by filmmakers to set particular boundaries. Questions for contemporary audiences should evoke discussions of eugenic-based policies today and the role science, government, and others continue to play in deciding who is and is not "fit" within any given society.

### A Bill of Divorcement (1932)<sup>21</sup>

In contrast to The Lynchburg Story, the 1932 dramatic film, A Bill of Divorcement, is a fictional morality tale concerned with eugenic self-regulation. Starring Katharine Hepburn and John Barrymore, A Bill of Divorcement is a melodramatic story of a mother (Margaret) and her daughter (Sydney). The opening scenes establish the fact that Margaret, recently divorced from Sydney's father, Hilary, is planning to marry her longtime suitor in the near future. Sydney is also quickly affianced; her beau, Kip, proposes in an early moment in the film. Sydney and Kip plan to move to Canada and have numerous children. The next day, the unexpected return of Sydney's father, Hilary, threatens to upend all of the carefully constructed romantic plans of both Margaret and Sydney. Hilary had been institutionalized for the almost the entirety of Sydney's life due to "shell-shock" brought on by his participation in "the war" (World War I). Hilary has been "cured" but has a child-like demeanor and has run away from the asylum. He seems wholly unaware of the passage of time and intends to resume his marriage to Margaret. Meanwhile, Sydney quickly becomes suspicious of her father's shell-shock diagnosis and interrogates her Aunt Hester about her family's medical history. To her immense horror, she discovers that "in [her] family, there's insanity."

Aware of her tainted family background, Sydney begins to question her decision to marry Kip. It is, however, a visit from a family friend and physician that ultimately persuades Sydney that she can never marry or have children. The doctor examines Hilary and tries to convince him to return to the asylum to be examined and released. Hilary refuses, arguing that he is "as fit as" the doctor. The doctor becomes angry and says that Hilary is "the man whose chil-

<sup>21.</sup> A Bill of Divorcement is a Selznick Production, directed by George Cukor and produced by David O. Selznick. It was released on VHS/Video Cassette by The CBS/Fox Company in 1990.

dren ought never have been born."<sup>22</sup> Sydney witnesses this exchange and, devastated by the implications of his statement, questions the doctor about her own "fitness." He assures her that she seems perfectly fit and healthy but offers no such reassurance about any potential offspring.

Resolute in her conviction never to marry or reproduce, Sydney attempts to drive Kip away—she smokes, she rebuffs his affections, and she belittles his intention to move to Canada. Ultimately, though, she breaks down and confesses the truth: there is insanity in the family and she is unfit to become a wife and mother. Kip persists and suggests they marry and remain childless, but Sydney claims that such an action would be unfair to Kip. The movie ends with Kip outside the house, trying to draw Sydney out, while Sydney and her father sit together at the piano working on one of Hilary's old compositions. Sydney has sacrificed her future marriage and happiness to care for her mentally unfit father.

In *A Bill of Divorcement*, the character of Sydney is transformed from a eugenically fit woman (who plans to do her part to combat race suicide by having a large number of children) to a tainted recluse (who plans to do her part to eradicate hereditary mental illness by refusing to have children). In both instances, the movie presents Sydney as making a noble choice, subsuming her own desires for the benefit of the greater population.

In presenting this movie to a student or general-interest audience, we have found it to be an effective way to highlight a number of significant aspects of the eugenics movement, particularly as it was popularly understood in the 1930s. By placing this film within the context of proposed eugenic marriage regulations, sterilization practices, the Great Depression, and the fight for the legalization of birth control, viewers gain a much better understanding of how a confluence of factors created a favorable atmosphere for the promotion of eugenics as a moral course of action. The film also fosters discussion of the historical tensions between individual rights (especially in terms of marriage and reproduction) and state regulation.

This film serves as an important contrast to *The Lynchburg Story*. Unlike the documentary, *A Bill of Divorcement* is set in an entirely upper-class world. The protagonists are well-spoken, impeccably dressed, refined, and apparently wealthy. Although it is set in England (and was based on a play by a British playwright, Clemence Dane), the actors are American and do not attempt a British accent. Were it not for the opening card that announces "England, Christmas Eve," American audiences would assume that the movie takes place at a wealthy New England estate.

<sup>22.</sup> Despite an obvious desire by the filmmakers to create sympathy for the Margaret and Sydney characters—characters posited to be innocent victims of a dysgenic marriage—contemporary students tend to empathize with the Hilary character. This (often) vehement disagreement with the doctor's sentiments and Margaret's action may reveal a great deal about a twenty-first-century understanding of and sensitivity to disability-related issues.

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Bill of Divorcement presents a homogenized and prosperous upper class, in striking contrast to the harsh economic environment of the early Depression. For the protagonists in the film, mentally ill children would not be a financial hardship; these people would not be dependent on charity and public asylums. Moreover, the script makes subtle reference to an upper-class privilege of the time-access to birth control. During Sydney's climactic scene with Kip, she argues that they cannot marry because of the risk that future children would be mentally ill. Kip counters by claiming that they could marry and remain childless. This option would only have been available to the upper classes at this time period, since in 1932, it was still illegal for physicians to supply birth control or birth control information to their patients.<sup>23</sup> Despite the illegality of birth control, wealthy women were able to acquire the necessary devices and information to control their fertility to some degree. Consequently, a childless marriage (through the assistance of contraceptive devices) would have been a viable alternative for Kip and Sydney. Yet Sydney refuses to entertain such an option, and it is in this moment that viewers encounter an interesting nexus of class and gender. Is Sydney being a noble woman? Does Kip's clean eugenic background and upper-class male status give him an unalienable right to progeny? What can we tell about gender roles at the time? How would the story change if the history of mental illness had been identified in Kip's family rather than Sydney's?

Discussants can then compare the picture of eugenics in *Bill of Divorcement* with that of *The Lynchburg Story*. By contrasting the Hollywood version of eugenics with the remembrances of real victims of eugenic sterilization, students and viewers can examine how popular culture packages problematic and complex trends into more palatable forms. Most importantly, viewers can interrogate the assumptions of normative class, race, gender, and sexuality made by 1930s filmmakers and documentarians of the 1990s.

Through the paired viewing of A *Bill of Divorcement* and *The Lynchburg Story*, interested viewers gain a much more nuanced view of eugenics in the 1920s and 1930s. In addition, viewers begin to appreciate the ways in which eugenics was marketed and sold to the American public during the Great Depression. In an era when women were denied access to contraception and millions of Americans were suddenly unemployed, the eugenics movement explicitly appealed to the fears of a large number of white Americans. Viewed as intent on regulating and policing the sexuality of those who were racially or economically "other," eugenicists were also known for pressuring wealthy white Americans to do their part to combat race suicide by procreating. The audience identifies with the struggle of the film's protagonists, Sydney and Jenny Crockett, to accept and challenge, respectively, the strictures of eugenic regulations. Through careful pedagogical use of these films, students and au-

<sup>23.</sup> Americans would not be guaranteed the right to use contraception until 1965 with the Griswold v. Connecticut Supreme Court decision. Ellen Chesler, Woman of Valor: Margaret Sanger and the Birth Control Movement in America (New York: Simon and Schuster, 1992), 372–76.

dience members learn to function as critical consumers of film and popular culture and gain access to the history of eugenics in a more immediate and arresting manner.

Finally, these films connect the history of eugenics, activism surrounding eugenics policies, and contemporary eugenic issues. Viewers come to understand America's historical legacy of Virginia, how activists worked for decades to change these policies and to gain public recognition of past wrongs, and the legacy of eugenics today. The absence of historical knowledge of eugenics among our college-age students provokes questions about why certain historical narratives are publicly privileged and others remain hidden. Activists continue to work to gain compensation for past victims of forced sterilization and to extract public recognition from states that have yet to acknowledge this history. Governor Mark Warner's apology to Virginians in 2002 was accompanied by the erection of a road marker in Charlottesville, Virginia recognizing Buck v. Bell and the devastating legacy it left for thousands of Virginians. The marker specifically references Carrie Buck, and two victims of state-sponsored forced sterilization, Jesse Meadows and Rose Brooks, helped unveil the marker. Finally, these films encourage us to contemplate societies that still use forced sterilization, particularly those in which reproduction is coerced (whether coercive in encouraging children and providing few to no alternatives or in penalizing individuals for having children). Viewing the history of eugenics on film serves as a learning opportunity for both past and present policies and a platform for advancing awareness and activism today.

MELISSA OOTEN received her Ph.D. from the College of William and Mary in the fall of 2005. Her dissertation examined film censorship in the New South through an analysis of gender, race, and sexuality. She is currently the assistant director of the WILL (Women Involved in Living and Learning) program at the University of Richmond, and she teaches in the Women, Gender, and Sexuality Studies department there.

SARAH TREMBANIS received her Ph.D. From the College of William and Mary in 2006. Her dissertation, *They Opened the Door Too Late: African Americans and Baseball*, 1900– 1947, explored the significance of space, images, folklore, nicknames, and manhood for Negro League baseball. Presently, she is an assistant professor of history at Immaculata University in Pennsylvania.