

## Sex or Sexuality Revisiting Lev 18-20

For centuries, Leviticus 18:22 and its rough parallel, Leviticus 20:13, have been invoked to turn people against one another, destroy lives, and oppress groups. The NRSV translates each verse as follows: “You shall not lie with a male as with a woman; it is an abomination (Lev. 18:22).” And Leviticus 20:13, “If a man lies with a male as with a woman, both of them have committed an abomination; they shall be put to death; their blood is upon them.” The version in Leviticus 20 is clustered around a handful of other prohibitions which merit the death penalty including adultery, sexual relations with one’s father’s wife, sexual relations with one’s daughter-in-law, sexual relations with one’s wife’s mother, and bestiality. These are the most taboo sexual relations in Leviticus 20. For about 2000 years, religious authorities have consistently emphasized only one of these prohibitions with zeal. The irony is that Leviticus 20:13 (and Leviticus 18:22) is the most difficult prohibition to identify because the syntax and wording are unusual and unclear. The challenge is exacerbated by the fact that this prohibition does not appear anywhere else in the Hebrew Bible. By comparison, the prohibition against adultery appears in the Ten Commandments (Ex 20:14; Dt 5:17), and is reiterated in Isaiah (Is 57:3), Jeremiah (Jer 3:8, 5:7, 7:9, 9:1, 23:10, 23:14, 29:23) Ezekiel (Ezek 16:32 and 38, 23:37 and 45) Hosea (Hos 3:1, 4:2 and 13, 7:4) Malachi (Mal 3:5), Psalms (Ps 50:18), Job (Job 24:15) and Proverbs (6:32). Adultery is consistently used in metaphorical contexts to describe Israel’s depravity. Nowhere in the Hebrew Bible do we encounter same-sex relations as an example of Israel’s depravity; in fact, there is no

word for homosexuality in biblical Hebrew. Nonetheless, post-biblical interpreters have and continue to invoke these two obscure verses in a variety of settings.

While Leviticus 20 organizes the prohibitions by order of severity, the organization of Leviticus 18 is a bit different. The chapter devotes most of its material to incest bans. Then the following appears:

<sup>19</sup>You shall not approach woman to uncover her nakedness while she is in her menstrual uncleanness. <sup>20</sup>You shall not have sexual relations with your kinsman's wife, and defile yourself with her. <sup>21</sup>You shall not give any of your offspring to sacrifice them to Molech, and so profane the name of your God: I am the LORD. <sup>22</sup>You shall not lie with a male as with a woman; it is an abomination. <sup>23</sup>You shall not have sexual relations with any animal and defile yourself with it, nor shall any woman give herself to an animal to have sexual relations with it: it is perversion.

Leviticus 18:19-23 presents five prohibitions that are loosely connected by the topic of male "seed"; in other words, these prohibitions are about where men should not inject their sperm. Verse 19 prohibits a man from having sexual intercourse with a woman while she is menstruating. The reference to Molech worship in Leviticus 18:21 seems, at first glance, out of place, since the prohibition addresses offspring and not sperm. A connection becomes apparent, however, in view of the range of meanings of the Hebrew word *zera* ("seed"), which can refer to plant seed, sperm, or offspring/progeny. The inclusion of Molech worship in a list of forbidden sexual unions (Lev 18:19-23) makes sense because each prohibition involves wasted seed: sexual intercourse during menstruation is less likely to result in pregnancy (v. 19); if a man impregnates his neighbor's wife (v. 20), the husband

claims the children; and sacrificing one's own children results in an obvious loss of progeny (v. 21). The message here is that sexual intercourse is for reproduction only.

Another difference between Leviticus 18 and 20 is their legal orientation. Baruch Levine notes that "chapter 18 laws are formulated apodictically, they are imperatives hence they specify no penalty for offences while chapter 20 is formulated casuistically, they are conditional and provide specific penalties for each offense."<sup>1</sup>

In this paper, I will focus on the difficulties of the Hebrew text and on modern historical-critical interpretations of these verses. Broadly speaking, there tend to be two approaches to interpreting this verse in modernity: a broad (liberal) reading and a strict (conservative) one. A liberal reading interprets the verse as a ban on homosexuality (this includes all male-male sex acts, female-to-female sex acts, romantic impulses, and social behaviors). A conservative strict reading interprets the verse as a prohibition against one specific sex act, male-to-male anal penetration.<sup>2</sup> A strict reading of the text entails a very careful examination of the actual Hebrew text in its linguistic/literary, theological and socio-economic contexts.

### **Linguistic/Literary Context:**

In rabbinic literature, there is a famous case referred to as *ben sorer u'moreh*, which is a response to the law in Deuteronomy 21:18-21 concerning the fate of a

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<sup>1</sup> Baruch Levine, *Leviticus*, 63.

<sup>2</sup> I am aware that my use of the labels "conservative" and "liberal" may seem jarring and at odds with the common applications of these terms. My use of these terms is deliberate and is meant to show that so-called conservative groups may be reading the Bible liberally, while so-called liberal groups may be reading the text more conservatively.

rebellious son. When the rabbis encountered the commandment to stone a rebellious son to death, they began to read limitations into the text. They created so many limitations regarding the child's age—the agreement of the parents' assessment, the sameness of the parents' own heights and appearances, the specific rebellious action and a particular history of prior misconducts and warnings by a court—that a rebellious son vanished for all practical purposes.<sup>3</sup> To a lesser extent, conservative interpretations of Leviticus 18:22 and Lev 20:13 move in this same direction to lessen the scope of this prohibition.

The basic difficulties with the Hebrew text are apparent when noting the variety of English translations and how each translation reveals a distinctive interpretation of the Hebrew. The first part of Leviticus 18:22 appears here in several translations:

You shall not lie with a man as with a woman... (NRSV)

Do not lie with a male as one lies with a woman... (NJPS)

With a male you are not to lie (after the manner of) lying with a woman...<sup>4</sup>

Thou shalt not lie with mankind, as with womankind... (KJV)

Notice that each translation adds a word that is absent in the Hebrew: "as" or "after the manner of." They also omit a word that is present in the Hebrew and that forms a construct with the word "woman." The construct translates literally as "lying downs of a woman." Thus the most literal translation of the verse is: "You

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<sup>3</sup> b. Sanh 71a.

<sup>4</sup> Everett Fox, *The Five Books of Moses: Genesis, Exodus, Leviticus, Numbers, Deuteronomy; A New Translation with Introductions, Commentary, and Notes* (New York: Schocken Books, 1997).

shall not lie the lying downs of a woman with a man, it is an abomination.” And regarding its rough parallel legislation in 20:13: “As for the man who lies the lying downs of a woman with a male, they, both of them, have committed an abomination; they shall certainly be put to death, their blood is upon them.”

Several questions arise while examining this verse in Hebrew. Does the text intend “man” or “male?” What does “lying downs of a woman” mean? Are the English additions of “as” or “after the manner of” reasonable and true to the original text? What does the Hebrew word for “abomination” mean? Is it moral or ritual?

In 1994, the *Journal of the History of Sexuality* published two articles by biblical scholars who revisited these verses in light of modern historical-critical and linguistic tools. Saul Olyan begins by pointing out that the Hebrew phrase, *mishkeve isha* “lying downs of a woman” is an “opaque idiom” whose meaning is far from clear.<sup>5</sup> The closest analogy to this phrase, he asserts, is found in Numbers 31 and Judges 21. There we find the phrase *mishkav zachar*, literally, “lying down of a male.” The issue at stake in these biblical chapters is determining a female virgin from a non-virgin. The non-virgin is a woman who has experienced *mishkav zachar* while a virgin has not experienced *mishkav zachar*. Olyan argues that since the issue at stake in these texts is virginity, *mishkav zachar* must indicate vaginal penetration. Olyan then reasons that *mishkeve isha* must indicate the corollary: vaginal receptivity. Thus, while a man offers a woman vaginal penetration (*mishkav zachar*), a woman offers vaginal receptivity (*mishkeve isha*). Thus, anal penetration was seen as

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<sup>5</sup> Saul Olyan, “‘And with a Male You Shall Not Lie the Lying Down of a Woman’: On the Meaning and Significance of Leviticus 18:22 and 20:1,” *Journal of the History of Sexuality* 5 (1994): 179–206, 183.

analogous to vaginal penetration.<sup>6</sup> I would point out that even in this analogy, the terms that mark gender are uneven; that is to say, *zachar* means “male” and its expected corollary would be *nekavah*, “female” (see Genesis 1). The word *isha*, an “adult woman,” would generally pair up with *ish*, an “adult man.” Nonetheless, Olyan’s argument is compelling and strong. Olyan further argues that Leviticus 18:22 addresses only the penetrator and not the receptive partner and that the inclusion of both participants in Leviticus 20 is the result of editorial changes.<sup>7</sup>

Olyan points out that the receptive role in the sex act became gendered (“the bounding of receptivity exclusively to women”) and became associated with the role of the woman, who was also seen as passive.

Each penetrator was seen as an agent acting on the body of his receptive partner (the woman in the case of adultery; the penetrated male in a male coupling); the receptive partner was in turn viewed as a passive recipient of that action rather than an active participant in his or her own right. Receptivity, if viewed as passivity, would perhaps have rendered them guiltless.<sup>8</sup>

In the same journal, Daniel Boyarin published an article entitled, “Are There Any Jews in ‘The History of Sexuality?’” in which he came to essentially the same conclusion as Olyan, that is, that the text is addressing male anal penetration only. His argument is based on rabbinic literature and Roman texts. Boyarin says, “The Torah’s language is very explicit; it is the use of a male as a female that is *toevah*, the

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<sup>6</sup> Olyan, “‘And with a Male You Shall Not Lie the Lying Down of a Woman’: On the Meaning and Significance of Leviticus 18:22 and 20:1,” *Journal of the History of Sexuality* 5 (1994): 179–206, esp. 183–86.

<sup>7</sup> Jerome T. Walsh (“Leviticus 18:22 and 20:13: Who Is Doing What to Whom?,” *JBL* 120 [2001]: 208) modifies Olyan’s theory to suggest that the case in Lev 18:22 is specifically “about anal sex between two men, one of whom is a free adult Israelite and takes the passive sexual role of being penetrated by the other.”

<sup>8</sup> Olyan, “And with a Male,” 189.

crossing of a boundary from one God-given category to another. . . . Moving a male body across the border into female metaphysical space transgresses the categories in the same way as putting on a female garment.”<sup>9</sup> Both Olyan and Boyarin argue that the writers of this material associated maleness with penetration and femaleness with receptivity.

More recently, David Tabb Stewart suggests that this ban needs to be considered within its textual context, the incest laws. He notes that “the lying of a male” indicates vaginal penetration (like Olyan) but he adds another biblical text into the discussion. In Genesis 49:4, Reuben is chastised because of *mishkeve avicha*, “the lyings of your father.” In this context the phrase is referring to the narrative in which Reuben has sexual intercourse with one of Jacob’s wives. Thus while *mishkeve avicha* literally means “lyings of your father,” the sense is “incest with the (step)mother.” Important to note is that Numbers 31 and Judges 21 use *mishkav zachar*, the singular “lying down.” In Genesis 49:4 and in Leviticus 18 and 20, all texts which deal with incest, the plural form of “lying downs” is used. Stewart suggests that the plural of lyings in these constructs has the technical sense of incest. He thus concludes:

The lyings-of-a-woman still presumes the agency of a male but refers to an act with another male by a kind of literary gender play. Just as the “lyings-of-your-father” refers to a usurpation of the father’s bed by the son, the “lyings-of-a-woman” metonymically refers to a male as incestuous object—a metonym because elaboration of the incest category has been (primarily) in terms of female objects (Lev. 18.7-16).<sup>10</sup>

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<sup>9</sup> Daniel Boyarin, “Are There Any Jews in ‘The History of Sexuality’?,” *Journal of the History of Sexuality* 5 (1994): 343–44

<sup>10</sup> David Tabb Stewart, “Leviticus,” in *The Queer Bible Commentary*, ed. Deryn Guest, Robert Goss, and Mona West (London: SCM Press, 2015), 97.

In other words, the verse is an expansion on the incest laws regarding male relatives of the same degree as the laws regarding women relatives that are enumerated in verses 6-18. For Stewart, there is no ban against male-to-male penetration outside of blood or familial ties.

K. Renato Lings presents a meticulous study of the grammatical and syntactical problems of Leviticus 18:22, and his conclusions are similar to Stewart's:

Sexual intercourse with a close male relative should be just as abominable to you as incestuous relationships with female relatives. If the whole of ch. 18 is read in this light, by the time we reach 18.22 virtually all possible combinations of incest are clearly forbidden. Then, the purpose of the added phrase of *miskeve 'issa* is to make sure that the general prohibition against incest applies in all directions. Thus, the Leviticus legislator is warning Israelite men that incestuous acts with members of either sex are punishable.<sup>11</sup>

Lings understands the phrase *mishkeve isha* as a reference to all the prohibited incestuous relationships listed in regard to female relatives. One suggestive and compelling rephrasing that he offers is: "With a male relative you shall not engage in sexual relationships prohibited with female relatives."<sup>12</sup> This verse therefore takes its natural place with the incest laws. In other words, if your sister is forbidden to you, then so is your brother.

David Tabb Stewart and K. Renato Lings limit the scope of the prohibition from anal penetration in general to the prohibition of anal intercourse with male relatives. The data that we have available for unpacking *mishkeve isha* is so limited

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<sup>11</sup> K. Renato Lings, "The 'Lyings' of a Woman: Male-Male Incest in Leviticus 18.22?," *Theology & Sexuality* 15 (2009): 245.

<sup>12</sup> *Ibid.* 246.

that anyone of these interpretations is possible, but not certain. In short, we simply do not know what the verse means! Any religious-moral arguments that are based primarily on this verse stand on shaky ground.

One final aspect of these verses must be considered and that is the Hebrew term which is usually translated as “abomination.” *to’evah* is used in various other situations that can illuminate its meaning. In Genesis 43:32 it is a *to’evah* for Egyptians to eat with Hebrews. In Deuteronomy 14:3 eating meat from unclean animals is a *to’evah*, and in Deuteronomy 32:16, the term is equated with foreign gods. Given these contexts, *to’evah* should be understood not as a moral term but as a cultic term. Its primary significance is in a cultic setting where actions can make individuals impure. There is no implicit moral judgment on the act itself. Male anal penetration was described as an abomination along with all the other prohibitions surrounding it, like adultery, because it was understood to transgress necessary boundaries needed to maintain a community of cultic purity. Outside the context of cultic purity/impurity concerns, there is no ban on male-to-male sex in the Bible. Upholding this ban in a post-Temple age is rather curious.

### **Theological Context:**

Another way of approaching Leviticus 18:22 and 20:13 is by considering the prohibitions within their context in Leviticus, situated within the body of priestly law known as the Holiness Legislation (Leviticus 17-26). Against the backdrop of the Holiness Legislation, we see that the maintenance of power structures and hierarchical relationships is legitimized by placing laws such as Leviticus 18:22

within legislation about holy community. Thus, the so-called homosexuality ban in Leviticus 18:22 is really a prohibition against deviation from the prescribed norms of masculinity as understood specifically by the Holiness legislators. In other words, the perspective of the Holiness writers does not necessarily represent the other sources that make up the Bible.

Leviticus 18:24-30 and Leviticus 20:22-26 warn the people of Israel that if they do not follow God's laws, they will be cast out of the land like its prior inhabitants, the Canaanites and other native peoples. Leviticus 18 sets the stage for the entire chapter by stating "You shall not do as they do in the land of Egypt, where you lived, and you shall not do as they do in the land of Canaan, to which I am bringing you..." (v.3) The forbidden behaviors that follow are meant to differentiate Israel from its neighbors. The specific wording of Leviticus 18:24-30 (and 20:22-26) reveals a unique theological premise of the Holiness Legislation: the land as a living agent with a body. Leviticus 18:24-25 is key in understanding this Holiness theology. There were other people living on the land, but they defiled themselves and the land with their sexual transgressions. As a result, God punished the land for its iniquity, and the land vomited out its inhabitants. Several points are important here: the actions of the inhabitants had an impact on the land and not just on the people. As such, all of the people throughout the land must maintain holiness and purity, to allow for the holy community and the land to coexist.<sup>13</sup>

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<sup>13</sup> For an excellent treatment of land issues in the Holiness Legislation, see Jan Joosten, *People and Land in the Holiness Code: An Exegetical Study of the Ideational Framework of the Law in Leviticus 17–26*, VTSup 67 (Leiden: Brill, 1996).

Relevant to this perspective is the fact that the Holiness writers emerged from the ancient Israelite priesthood. As Mary Douglas has famously written, “defilement is never an isolated event. It cannot occur except in view of a systematic ordering of ideas.”<sup>14</sup> Furthermore, Douglas points out that in the priestly materials “holiness requires that individuals shall conform to the class to which they belong. And holiness requires that different classes of things shall not be confused.”<sup>15</sup> Just as pure and impure, or holy and profane must be carefully distinguished at all times, so too do male penetration and female receptivity.

In this context, the problem at the center of the Holiness legislation prohibitions appears to be that gender distinctions are considered critical in establishing a distinct Israelite identity. In this environment, men are penetrators while women are to be penetrated. For men to take the role of women is to mix and confuse gender identities hence male-to-male anal penetration is described as an abomination. This would also explain why Leviticus 18:22 and 20:13 do not mention female-to-female sexual activities because it was believed that women could not penetrate each other. Sex is defined solely as an act of penetration into a receptive vessel. The regulations of Leviticus understand male-to-male penetration as a transgression of gender roles.

### **Socio-Economic Context:**

Another important context to consider in making sense of these verses is Israel’s neighbors. There are a few ancient Near Eastern law codes that address

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<sup>14</sup> Mary Douglas, “The Abominations of Leviticus”, 119.

<sup>15</sup> Ibid, 130.

male sexual penetration of another male. Laws 19 and 20 of the Middle Assyrian laws from the time of Tiglath-Pileser I state that

19: If a man started a rumor against his neighbor in private, saying, 'People have lain repeatedly with him', or he said to him in a brawl in the presence of (other) people, 'People have lain repeatedly with you; I will prosecute you,' since he is not able to prosecute (him) (and) did not prosecute (him), they shall flog that man fifty (times) with staves (and) he shall do the work of the king for one full month; they shall castrate him and he shall also pay one talent of lead. 20: If a man lay with his neighbor, when they have prosecuted him (and) convicted him, they shall lie with him (and) turn him into a eunuch."

In this case, the first law addresses false accusations and threats. The punishment is castration and a fee. In other words, if a man accuses another man of playing the role of a receptive female and this public claim is used as an act of threat, then the false accuser is emasculated. Law 20 likely refers to homosexual rape, because the punishment, based on an eye for an eye is that the guilty party is to be raped and castrated.

The association of male sexual receptivity and humiliation is also attested in the Hittite laws. Law 189 states, "If a man violates his own mother, it is a capital crime. If a man violates his daughter, it is a capital crime. If a man violates his son, it is a capital crime." The crime is not about anal sex, it is about abuse and violence against vulnerable family members. Steven Greenberg writes, in connection with Jewish sources that "In the few sources where male homosexual relations do appear, they are part of a depiction of exploitation, violence, selfishness and cruelty."<sup>16</sup> This remark is perfectly applicable to the ancient Near Eastern laws as well.

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<sup>16</sup> Steven Greenberg, *Wrestling with God and Man: Homosexuality in the Jewish Tradition* (Wisconsin: The University of Wisconsin Press, 2004), 67.

Another angle by which we might understand Leviticus 18:22 and Leviticus 20:13 is by considering ancient Mediterranean societies of which the writers of the Bible belonged. In Roman culture, it was perfectly acceptable for a Roman male citizen to sexually penetrate not only women, but also males of a lower social ranking. Michael Satlow cites a text from Gen Rab 63:10 in which Israel laments to God about being ruled by Rome. "Israel, seeing that homoerotic intercourse occurs in Rome, complains that Rome, in effect, has no right to rule not because Romans are engaged in homoerotic intercourse per se, but specifically because they allow themselves to be penetrated. By allowing themselves to be penetrated, they sacrifice their 'maleness,' a characteristic deemed necessary for political power."<sup>17</sup> In Greco-Roman culture, an adult man could sexually penetrate a woman, a male slave, or a boy without any censure, because he was abiding by the power dynamics of those relationships. An adult male who allowed himself to be penetrated, however, was condemned (as was a woman who played the role of a penetrator) because this act was contrary to sanctioned power relationships. As Michael Satlow and others have argued, in early Judaism under Hellenistic influence, the Jewish sources often describe the deviation from the normative penetrating role as going against the laws of nature.<sup>18</sup> In this ancient view of nature, maleness was understood as penetrating and active, while femaleness was associated with submissiveness and reception. This same understanding is found in the writings of medieval Jewish commentator,

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<sup>17</sup> Michael L. Satlow, *Tasting the Dish: Rabbinic Rhetorics of Sexuality* (Atlanta, GA: Scholars Press, 1995), 213.

<sup>18</sup> Michael L. Satlow, "'They Abused Him Like a Woman': Homoeroticism, Gender Blurring, and the Rabbis in Late Antiquity," *Journal of the History of Sexuality* 4 (1994): 1-25.

Abraham Ibn Ezra, commenting on Lev. 18:22 he writes “since the male was created to act and the female to be acted on, the verse reminds us not to overturn the word of God.”<sup>19</sup>

### **Implications for Today:**

How do we align what we understand (and do not understand) about the biblical prohibition with modern condemnations of homosexuality? Like most other biblical sources, the authority of religious leaders takes precedence over the text itself. This is the nature of meaning making and interpretation. Christian and Jewish communities of interpreters suppress some biblical material and highlight other. Interpreters connect texts in creative and often brilliant ways to address the conditions and norms of their worlds. An anonymous wrote a letter to Dr. Laura Schlessinger, a socially conservative radio show host in the year 2000.<sup>20</sup> In the letter, the writer thanks Dr. Laura for condemning homosexuality, citing Lev 18:22, and then proceeds to ask a few additional questions like, “I would like to sell my daughter into slavery, as sanctioned in Exodus 21:7. In this day and age, what do you think would be a fair price for her?” Obviously, the writer is pointing to the pick and choose attitude as regards the observance of biblical law. While the writer parodies the talk radio host, this is how all engagement with text works.

My opinion is that in the inevitable course of picking and choosing, religious communities that ban homosexuality are stretching their interpretive practices to the limit. Let me explain this with an analogy: If a community were to prohibit

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<sup>19</sup> Abraham Ibn Ezra in: Greenberg, *Wrestling with God and Men*, 175.

<sup>20</sup> Dr. Laura Schlessinger is a conservative social commentator who was especially renowned in the late 1990s for her syndicated talk radio show called the *Dr. Laura Program*.

adultery or infidelity, look upon this act with disgust and revulsion, and enforce this ban by removing all adulterers from their community – that would be reasonable given the pervasive presence of biblical texts that clearly prohibit adultery in a number of contexts. They could point to the centrality of fidelity in the Hebrew Bible’s covenantal relationship between God and Israel.

When readers assert that homosexuality is a sin, citing the two verses in Leviticus, they are ignoring the fact that this Hebrew text is elusive. They ignore the surrounding prohibitions like sexual intercourse with a menstruant. They cut off this text from the broader theological worldviews of the ancient Israelite priesthood. Perhaps, more importantly, communities that condemn homosexuality and cite Leviticus in support of this position are condemning a group that did not exist in biblical times.

LGBTQ<sup>21</sup> identity, as with any other identity marker, is a complex construction of which sex acts are just a part. The word “homosexuality” emerged in 19<sup>th</sup> century Europe, just as the social identity was first created. In this modern environment, a fantasy of a certain type of male who had distinctive dress styles, particular gaits and other social behaviors including an insatiable lust for all other men was invented. As Michel Foucault has argued, “Homosexuality appeared as one of the forms of sexuality when it was transposed from the practice of sodomy onto a kind of interior androgyny, a hermaphroditism of the soul. The Sodomite had been a temporary aberration; the homosexual was now a species.”<sup>22</sup> Sexuality is

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<sup>21</sup> An acronym for lesbian, gay, bisexual, transgender, queer.

<sup>22</sup> Michel Foucault, *The History of Sexuality: An Introduction*, Volume 1, New York: Vintage Books, 1990, 43.

determined by expectations set on the social body by culture. The social body is defined by society resulting in the construction of the masculine and feminine bodies, in which case “masculinity is the aggregate combining the congruent functions of penetration, activity, dominance and social precedence [while] femininity signifies penetrability, passivity, submission and social subordination.”<sup>23</sup> In other words, if Leviticus 18 and 20 do indeed address cases of men penetrating other male relatives or raping other men, this violent sex act has nothing to do with sexuality.

Whether the prohibition appears in Leviticus 18:22 as part of incest taboos or as part of an attempt to self-differentiate from the Canaanites, the concept of a penetrator and penetrated one comes down to power relationships. The penetrator is the person with power, and the receptive partner is of a lesser status. So why do religious authorities invoke Leviticus 18:22 and 20:13 with such fervor given that the exegetical move is quite weak? The answer is simple: masculinity equals an active agent equals power.

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<sup>23</sup> Halpern, *One Hundred Years of Homosexuality*, 140.