Social contacts that do not occur in the context of an "organized association" may be unprotected, however. In holding that a state may restrict admission to certain licensed dance halls to persons between the ages of 14 and 18, the Court declared that there is no "generalized right of 'social association' that includes chance encounters in dance halls." [618]

In a series of three decisions, the Court explored the extent to which associational rights may be burdened by nondiscrimination requirements. First, *Roberts v. United States Jaycees* [619] upheld application of the Minnesota Human Rights Act to prohibit the United States Jaycees from excluding women from full membership. Three years later in *Board of Directors of Rotary Int'l v. Rotary Club of Duarte*,[620] the Court applied *Roberts* in upholding application of a similar California law to prevent Rotary International from excluding women from membership. Then, in *New York State Club Ass'n v. New York City*,[621] the Court upheld against facial challenge New York City's Human Rights Law, which prohibits race, creed, sex, and other discrimination in places "of public accommodation, resort, or amusement," and applies to clubs of more than 400 members providing regular meal service and supported by nonmembers for trade or business purposes. In *Roberts*, both the Jaycees' nearly indiscriminate membership requirements and the state's compelling interest in prohibiting discrimination against women were important to the Court's analysis. The Court found that "the local chapters of the Jaycees are large and basically unselective groups," age and sex being the only established membership criteria in organizations otherwise entirely open to public participation. The Jaycees, therefore, "lack the distinctive characteristics [*e.g.*, small size, identifiable purpose, selectivity in membership, perhaps seclusion from the public eye] that might afford constitutional protection to the decision of its members to exclude women." [622] Similarly, the Court determined in *Rotary International* that Rotary Clubs, designed as community service organizations representing a cross section of business and professional occupations, also do not represent "the kind of intimate or private relation that warrants constitutional protection." [623] And, in *New York City*, the fact "that the antidiscrimina-

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[618] City of Dallas v. Stanglin, 490 U.S. 19, 24, 25 (1989). The narrow factual setting—a restriction on adults dancing with teenagers in public—may be contrasted with the Court's broad assertion that "coming together to engage in recreational dancing . . . is not protected by the First Amendment." Id. at 25.

[619] 468 U.S. 609 (1984).

[620] 481 U.S. 537 (1987).

[621] 487 U.S. 1 (1988).

[622] 468 U.S. at 621.

[623] 481 U.S. at 546.