



**CAMPAIGN FINANCE REFORM IN THE WAKE OF  
CITIZENS UNITED**

**By: Emily Carroll**

**Paul Simon Public Policy Institute**

**Graduate Research Fellow**

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## Introduction

Over the last decade, major attempts have been made to curb corruption through defining what is acceptable and what is not acceptable in terms of electioneering communications, campaign contributions, and limits placed on donations made by individuals, unions, and corporations.

However, as quickly as safeguards and rules are put in place, they are challenged. Beginning in 2002 with the passage of the Bipartisan Campaign Reform Act (also known as the McCain-Feingold Act), to 2010 with the *Citizens United v. Federal Election Commission*, and following up with the recent ruling in the Montana case (*American Tradition Partnership v. Bullock*) that confirmed *Citizens United* and upheld the idea that states cannot limit corporate campaign contributions, this paper seeks to understand what these changes mean for campaign finance. More specifically, it is interested in examining how the 22 states that have come together as plaintiffs in the Montana case view the problem, define the issue, and hope to deal with it or curtail it. Overall, what does the Montana ruling mean for campaign finance policy in the states?

## Background

Our story begins with a conservative, non-profit corporation, Citizens United. This organization's proclaimed mission is, "dedicated to restoring citizen control to our government" through the creation and use of, "television commercials, web advertisements, and documentary films (Citizens United 2011)." One of the "hard-hitting" documentary films that the group is known for is entitled "Hillary: The Movie." In this documentary, Citizens United attempted to, "expose the Clinton scandals of the

past and present (Hillary The Movie 2012).” However, before this film or advertising for it could be aired, the Federal Election Commission put a stop to it, citing the Bipartisan Campaign Reform Act of 2002 (BCRA). Under BCRA, corporations and unions were prohibited from broadcasting “electioneering communications” (otherwise known as issue ads) 30 days before a primary election or 60 days before a general election (Federal Election Commission 2012).

This kind of regulation did not sit well with Citizens United. In fact, the organization took its issue all the way to the United States Supreme Court, citing protection under the First Amendment (freedom of speech). In the 2010 landmark Supreme Court case *Citizens United v. Federal Election Commission*, the Court ruled 5-4 that BCRA’s electioneering communications clause did, in fact, violate the rights guaranteed under the First Amendment (Supreme Court 2010; SCOTUSblog 2012). The opinion of the court can be best summarized in the writing of Justice Stevens who wrote the dissent, “The basic premise underlying the Court’s ruling is its iteration, and constant reiteration, of the proposition that the First Amendment bars regulatory distinctions based on a speaker’s identity, including its ‘identity’ as a corporation (Stevens 2010, pg. 2).”

In other words, the *Citizens United* ruling provided corporations with the same status and rights as individuals. Basically, corporations became people with all the privileges and protections as afforded by the 14<sup>th</sup> Amendment (United States Courts 2012). They (and labor unions) could take funds directly from their treasuries and contribute them to their favored candidates and parties. As shocking as this ruling was to some, it should be noted that this was not the first time the courts ruled in favor of

extending individual rights to corporations. The precedent was established in the 1886 case of *Santa Clara County v. Southern Pacific Railroad Company* (The Superior Court of California County of Santa Clara 2012). That landmark established the precedent that one of the three Civil War amendments (the 14<sup>th</sup>) was to be interpreted as protecting corporations rather than individuals, in this instance, the freed slaves the amendment was originally designed to protect.

In the wake of the *Citizens United* case, what is now known as the “Montana case” emerged. Montana's campaign finance laws placed specific limitations on individuals, unions, and, more importantly, corporations. According to the National Conference of State Legislatures, individuals and unions in Montana were held to the same limits on what they could contribute: “\$630/gubernatorial slate, \$310/other statewide candidate, and \$160/legislative candidate” per election (2011). Interestingly, though, corporations were prohibited from donating to candidates (National Conference of State Legislatures 2011). The law that prohibited corporations from donating to political candidates has been on the books since 1912 (SCOTUSblog 2012). It originated in a scandal-ridden era in Montana when corporations were seen as particularly blatant in their use of campaign cash to buy legislative allies. However, because of the Supreme Court ruling in *Citizens United v. Federal Election Commission*, the Supreme Court decided to take a look at *American Trade Partnership, Inc. v. Bullock* (the Montana case) and therefore the Montana law, without the formality of a full review (SCOTUSblog 2012).

The result of the quick review was to, “overturn a Montana Supreme Court decision upholding a 1912 voter-approved ban on corporations’ spending of their own

money on political campaigns in that state (SCOTUSblog 2012).” The Supreme Court found that the state court ruling was in direct conflict with the 2010 Supreme Court *Citizens United* decision (SCOTUSblog 2012). “The four Justices in dissent conceded that the Supreme Court majority was not ready to take a new look at that 2010 decision, even in a case in which a state’s highest court had found that the state had a history of corrupt corporate influence in its political life (SCOTUSblog 2012).”

Once the decision was made by the Supreme Court to uphold the ruling made in the *Citizens United* case, 22 states came together, concerned about the potential effects of such a decision on the laws in their own states. The 22 states concerned with this ruling were led by New York and include Arkansas, California, Connecticut, Delaware, Hawaii, Idaho, Illinois, Iowa, Kentucky, Maryland, Massachusetts, Minnesota, Mississippi, Nevada, New Mexico, North Carolina, Rhode Island, Utah, Vermont, Washington, West Virginia, and the District of Columbia (Gouras 2012). These states came together to “back Montana in its fight to prevent the U.S. Supreme Court's 2010 *Citizens United* decision from being used to strike down state laws restricting corporate campaign spending (Gouras 2012).”

## **And Then There Were 22**

Each of the 22 states has different campaign finance laws. For instance, Utah currently has no limitations on campaign donations by individuals or corporations (National Conference of State Legislatures 2011). The limits for individuals and for corporations are the same in Arkansas, California, Delaware, Hawaii, Idaho, Maryland, Nevada, New Mexico, Vermont, Washington state (National Conference of State

Legislatures 2011), and Washington, D.C. (District of Columbia Office of Campaign Finance 2012). There are states in which individuals and corporations are held to different standards when it comes to campaign donations, like Illinois, Mississippi, and New York (National Conference of State Legislatures 2011). Finally, there are states that allow individuals to make campaign donations but prohibit corporations from doing so, including Connecticut, Iowa, Kentucky, Massachusetts, Minnesota, North Carolina, Rhode Island, Washington (for corporations not doing business in Washington), and West Virginia (National Conference of State Legislatures 2011).

### **States with the Same Contribution Limits for Individuals and Corporations**

For those states with contribution limits that are the same for individuals and corporations, it is important to understand that even though they are the same within the state, contribution limits can differ between states. For instance, in Arkansas, individuals and corporations are limited to giving \$2,000 per candidate per election (National Conference of State Legislatures 2011).

California laws dictate that individuals and corporations are allowed to give \$26,000 per gubernatorial candidate, \$6,500 per statewide candidate, and \$3,900 per legislative candidate per election cycle (National Conference of State Legislatures 2011).

In Delaware, they are limited to \$1,200 per statewide candidate and \$600 for all other candidates per election cycle (National Conference of State Legislatures 2011).

Hawaiians and corporations within the state are permitted to give \$6,000 per statewide candidate, \$4,000 per Senate candidate, and \$2,000 per House candidate

per election cycle (National Conference of State Legislatures 2011). Interestingly, Hawaii goes so far as to define contribution limits from a candidate's immediate family; limiting family members to \$50,000 per election cycle, including loans (National Conference of State Legislatures 2011).

Idaho state law dictates that individuals and corporations are allowed to contribute \$5,000 per statewide candidate and \$1,000 per legislative candidate per election cycle (National Conference of State Legislatures 2011).

Those living and doing business in Maryland are limited to giving \$4,000 per candidate and \$10,000 aggregate to all candidates per 4-year election cycle (National Conference of State Legislatures 2011).

Nevada's laws are simple, stipulating that individuals and corporations are limited to giving \$5,000 per candidate per election (National Conference of State Legislatures 2011).

New Mexico allows for individuals and corporations to give \$5,000 per statewide candidate and \$2,300 per non-statewide candidate per election (National Conference of State Legislatures 2011).

In Vermont, individuals and corporations are permitted to give \$1,000 per candidate per election but (unlike Hawaii) immediate family members are allowed to give without limitation to their family members' campaigns (National Conference of State Legislatures 2011).

Those living and working in the state of Washington are allowed to give \$1,600 per gubernatorial candidate and \$800 per legislative candidate. It should be noted that corporations not doing business in Washington state are prohibited from giving to

Washington state candidates (National Conference of State Legislatures 2011). Furthermore, “During the 21 days before the general election, no contributor may donate more than \$50,000 in the aggregate to any candidate” including a “candidate’s personal donation to his/her campaign (National Conference of State Legislatures 2011).”

Lastly, in Washington, D.C., individuals and corporations are limited to giving \$2,000 per candidate for mayor/shadow senator/shadow representative, \$1,500 per candidate for chairman of the council, \$1,000 per at-large council candidate, \$500 per candidate for the Board of Education and/or Ward Council member, \$200 per candidate for the Board of Education “elected from a school district or for an official of a political party,” \$25 for a candidate of an Advisory Neighborhood Commission, but contributions are unlimited when it comes to supporting or opposing initiatives or referendum measures (District of Columbia Office of Campaign Finance 2012). Contributions from individuals and corporations cannot exceed \$8,500 per election cycle in Washington D.C. (District of Columbia Office of Campaign Finance 2012).

### **States with Different Contribution Limits for Individuals and Corporations**

In a number of the states in question, individuals and corporations are held to different standards. In Illinois, individuals are allowed to give up to \$5,000 per election cycle and corporations are allowed to give \$10,000 per election cycle (National Conference of State Legislatures 2011).



In Mississippi, individuals can give without limitation, while corporations are limited to giving \$1,000 per candidate per calendar year (National Conference of State Legislatures 2011).

New York has contribution limits that are more in-depth than most states. Individuals are allowed to give the “product of number of enrolled voters in candidate’s party in state (excluding voters in inactive status) x \$0.005, but not less than \$6,500 or more than \$19,700” to a gubernatorial candidate in a primary and \$41,100 to a gubernatorial candidate in a general election (National Conference of State Legislatures 2011). Individuals are allowed to give \$6,500 per Senate candidate and \$4,100 per House candidate in a primary election and \$10,300 per Senate candidate and \$4,100 per House candidate per general election (National Conference of State Legislatures 2011). Individuals are limited to a maximum contribution limit of \$150,000 in the aggregate per election cycle (National Conference of State Legislatures 2011). New York also has individual limits on contributions made by family members to a candidate’s campaign (National Conference of State Legislatures 2011). Family member limits are based on a formula, but more generally, they are not allowed to give more than \$100,000 to a (legislative) candidate’s campaign (National Conference of State Legislatures 2011). Though New York is very particular about individual campaign contributions, the state is fairly simple in how it limits its corporations: “Corporations are limited to \$5,000 per year in aggregate contributions to NY state candidates and committees (National Conference of State Legislatures 2011).”

## **States that Prohibit Corporations from Making Contributions**

In other states, campaign contribution laws prohibit corporations from donating and have different limits for individuals.

In Connecticut, individuals are allowed to give \$3,500 to gubernatorial candidates, \$1,000 to Senate candidates, \$250 to House candidates, and \$15,000 in the aggregate to all individual campaigns/candidates and committees per election cycle (National Conference of State Legislatures 2011).

In Iowa, individuals can give an unlimited amount per election cycle, but corporations are prohibited from contributing directly (National Conference of State Legislatures 2011). Kentuckians and West Virginians are limited to giving \$1,000 per candidate per election (National Conference of State Legislatures 2011).

Massachusetts allows individuals to give \$500 per candidate but they cannot exceed \$12,500, the aggregate limit on contributions to all candidates (National Conference of State Legislatures 2011). Interestingly, Massachusetts acknowledges registered lobbyists in their individual limits policy. "Registered lobbyists may only contribute up to \$200 per candidate" per calendar year (National Conference of State Legislatures 2011).

In Minnesota, contributions are limited by the kind of year it is in the election cycle. In election years, individuals are allowed to contribute \$2,000 per gubernatorial candidate and \$500 per legislative candidate (National Conference of State Legislatures 2011). In a non-election year, individuals are allowed to give \$500 per gubernatorial candidate and \$100 per legislative candidate (National Conference of State Legislatures 2011).

North Carolina allows individuals to contribute \$4,000 per candidate per election (National Conference of State Legislatures 2011).

Rhode Island limits individuals a little differently. Individuals are allowed to give \$1,000 per candidate or \$2,000 per candidate if the candidate, “qualifies for public funding and agrees to abide by spending limits (National Conference of State Legislatures 2011).” But Rhode Island goes a step farther, limiting contributions by individuals to \$10,000 in aggregate contributions to “candidates, PACS (political action committees), and party committees per year (National Conference of State Legislatures 2011).”

## **Effects of the Montana Ruling**

The Supreme Court’s ruling in the Montana case reinforced the power of corporations by providing them the same rights and privileges as individual citizens. It also severely diminished the right of the states to regulate in the campaign finance area. The 22 states previously discussed rallied against this decision for two reasons. First, the states are interested in defending states’ rights and the rights that put the campaign finance laws and limitations in place. This is obvious in the diversity of regulations and contribution limits in each of these states. Second, the states believe that corporate expenditures lead to corruption or at least the appearance of corruption and therefore wish to avoid this kind of slippery slope (Gold 2012; Sacks 2012). In fact, most of the history of campaign finance regulation has been predicated on the objective of controlling public corruption and/or the appearance of corruption. As one reform group argues:

“The problem with money in politics is not so much the amount that is spent on campaigns as it is who pays for them, what they get in return, and how that affects public policy and spending priorities (Common Cause 2012).”

The state of New York led the other 22 states through drafting a brief that “ask[ed] the high court to preserve Montana's state-level regulations on corporate political expenditures (Gouras 2012 “).” This brief was drafted by the New York Attorney General’s office but was supported by the other 22 states. However, the Supreme Court’s decision and its avoidance of a full hearing on the subject, has completely invalidated state bans and limits on corporate campaign spending in local, state, and federal elections (Gouras 2012). Interestingly, the brief and the 22 states that support it, argue that the Montana law was different from the *Citizens United* ruling and therefore at least parts of the law should be reconsidered (Gouras 2012).

At that time, reformers vowed to continue pursuing campaign finance reform measures in the states, in Congress, and in the courts (Kroll 2012). This comes even with the understanding that with the recent decision and the current political climate, reform will be an uphill battle (Kroll 2012). One reformer was quoted as saying regardless of the Montana ruling and the effects of the *Citizens United* case, “the battle in Congress, the states and the courts for effective campaign finance laws to prevent the corruption of our officeholders and government decisions will go forward full speed ahead (Kroll 2012).” Some have gone so far as to advocate an amendment to the United States Constitution to overturn the *Citizens United* decision.

But since the Montana ruling and the backlash it created, little has been done to counter the decision. Perhaps after the November 2012 elections, reformers will be able to gain a foothold and make strides toward reform that involves revoking the power and legitimacy given to corporations when it comes to campaign contributions. But for now, reform, and politics in generally, seem to be in a bit of a holding pattern.

Reform groups continue to discuss options for the future including a push for more disclosure (Feingold 2012), corporate accountability (Common Cause 2012), and public funding (Common Cause 2012; Blumenthal 2012; Think Progress 2012; The Center for Public Integrity 2012), and ending the pay-to-play game in government and in campaigns (Common Cause 2012), therefore no longer focusing on the fundraising aspect of the industry (Public Campaign 2012). Others continue to focus on reversing *Citizens United*, arguing that campaign finance reform cannot progress until this happens (Common Cause 2012; The Center for Public Integrity 2012; Feingold 2012).

## **Post-Election 2012**

Since the November elections, there has been little to no change with regard to campaign finance. What did change was the unprecedented amount of money spent on 2012 campaigns and candidates including, “the first \$1 billion presidential candidate, the first \$70 million Senate campaign, the first \$20 million House candidate, and a record \$1 billion spent by independent groups (Blumenthal 2013).” This spending boom can be largely attributed to *Citizens United* -- most organizations can contribute to political candidates and campaigns without effective limit or disclosure. Though there have been vocal opponents to *Citizens United* and the Montana ruling, the political reality of the

situation (i.e. unlimited funding) has set in. For example, President Obama, after condemning super-PACs, eventually succumbed to the financial pressure of the election and of current campaign laws. He asked supporters to contribute to his campaign and to the super-PAC that was supporting him (Kroll 2012), and it raised millions of dollars on his behalf.

Furthermore, the current tax and campaign spending laws are being challenged by campaign finance reform advocates in California, Idaho, Maine, and continue in Montana (Wieder 2012). These states are seeking disclosure of all political donors and potential donors – national and state-level (Wieder 2012). Proponents argue that a national uniform approach is the only way to ensure transparency in contributions and campaign finance (Wieder 2012).

## **2013**

The new year brought new challenges to current campaign finance laws. There have been three key pieces of legislation introduced in Congress including the Disclose Act (seeks to increase transparency through contribution disclosure), the Empowering Citizens Act, and the Fair Elections Now Act (both seek to protect small donors through contribution limits) (Blumenthal 2013). Finally, there has been a push to amend the Constitution and essentially roll back the *Citizens United* decision. Although this is the longest of all the legislative efforts, there is support in many states for an amendment (Blumenthal 2013). Overall, these efforts are meant to increase transparency, set contribution limits, and protect private citizens (Blumenthal 2013).

On another note, in mid-February the Supreme Court took its first campaign finance case on overall limits on political donations -- *McCutcheon v. Federal Election Commission* (Liptak 2013). This case argued, “the limit on what individuals are allowed to give candidates (\$46,200 per two-year cycle) and parties and PACs (\$70,800 per two-year cycle) is an unconstitutional violation of the individual donor's free speech rights (Blumenthal 2013).” However, within a few days, the Court decided that it would no longer hear the case essentially reaffirming the *Citizens United* ruling (Overby 2013).

Overall, the situation remains largely the same. Opponents of *Citizens United* continue to cite the lack of transparency in campaign finance, the unfair advantage the wealthy have in affecting campaigns and politics, and the moral issue of giving corporations the same status under the law as private citizens. For these reasons, they continue to seek legislative reform, approval from the states, and popular support for their efforts. Those who favor the changes made by the *Citizens United* ruling continue to cite the case as settled law, a protection of free speech rights, and advocate for the changes it made.

As demonstrated by the 2012 elections, *Citizens United* has changed campaigns and the amount of money involved. Until the Supreme Court revisits and changes the opinion, it is likely corporations will have an expanded ability to influence campaigns and elections. Expenditures in American political campaigns, particularly at the federal level, will continue to escalate.

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## Appendix

**Table 1: The 22 States of Interest and Their Campaign Finance Laws by Category**

<b>State Name</b>	<b>No Limits</b>	<b>Same for Individuals and Corporations</b>	<b>Different for Individuals and Corporations</b>	<b>Corporations Prohibited</b>
<b>Arkansas</b>		X		
<b>California</b>		X		
<b>Connecticut</b>				X
<b>Delaware</b>		X		
<b>Hawaii</b>		X		
<b>Idaho</b>		X		
<b>Illinois</b>			X	
<b>Iowa</b>				X
<b>Kentucky</b>				X

<b>Maryland</b>		X		
<b>Massachusetts</b>				X
<b>Minnesota</b>				X
<b>Mississippi</b>			X	
<b>Nevada</b>		X		
<b>New Mexico</b>		X		
<b>New York</b>			X	
<b>North Carolina</b>				X
<b>Rhode Island</b>				X
<b>Utah</b>	X			
<b>Vermont</b>		X		
<b>Washington*</b>		X		X
<b>West Virginia</b>				
<b>District of Columbia</b>		X		

**Table 2: The 22 States of Interest and Their Campaign Finance Laws**

<p><b>State</b></p>	<p><b>Individual <input type="checkbox"/></b> <b>Candidate</b> <b>Contributions</b></p>	<p><b>Corporate <input type="checkbox"/></b> <b>Contributions</b></p>
<p><b>Arkansas</b></p>	<p>\$2,000/candidate/election</p>	<p>\$2,000/candidate/election</p>
<p><b>California</b></p>	<p>Unlimited</p>	<p>Unlimited</p>
<p><b>Connecticut</b></p>	<p>\$3,500/gub candidate \$1,000/senate candidate \$250/house candidate  \$15,000 aggregate/ individual to all candidates and committees  <i>All amounts are per election.</i></p>	<p>Prohibited</p>
<p><b>Delaware</b></p>	<p>\$1,200/statewide candidate \$600/other candidate  <i>All amounts per election cycle.</i></p>	<p>\$1,200/statewide candidate \$600/other candidate  <i>All amounts per election cycle.</i></p>

<p><b>Hawaii</b></p>	<p>\$6,000/statewide candidate \$4,000/senate candidate \$2,000/house candidate</p> <p>Contributions from a candidate's immediate family are limited to \$50,000 in an election cycle, including loans.</p> <p><i>All amounts per election cycle.</i></p>	<p>\$6,000/statewide candidate \$4,000/senate candidate \$2,000/house candidate</p> <p>Contributions from a candidate's immediate family are limited to \$50,000 in an election cycle, including loans.</p> <p><i>All amounts per election cycle.</i></p>
<p><b>Idaho</b></p>	<p>\$5,000/statewide candidate \$1,000/leg candidate</p> <p><i>Amounts are per election.</i></p>	<p>\$5,000/statewide candidate \$1,000/leg candidate</p> <p><i>Amounts are per election.</i></p>
<p><b>Illinois</b></p>	<p>\$5,000 per election cycle</p>	<p>\$10,000 per election cycle</p>
<p><b>Iowa</b></p>	<p>Unlimited</p>	<p>Prohibited</p>
<p><b>Kentucky</b></p>	<p>\$1,000/candidate/election</p>	<p>Prohibited</p>
<p><b>Maryland</b></p>	<p>\$4,000/candidate \$10,000 aggregate to all candidates</p> <p><i>Both amounts are per 4-year election cycle (1/1/11-12/31/14)</i></p>	<p>\$4,000/candidate \$10,000 aggregate to all candidates</p> <p><i>Both amounts are per 4-year election cycle (1/1/11-12/31/14)</i></p>

<p><b>Massachusetts</b></p>	<p>\$500/candidate</p> <p>\$12,500/individual aggregate limit on contributions to all candidates</p> <p>Registered lobbyists may only contribute up to \$200/candidate</p> <p><i>All amounts are per calendar year.</i></p>	<p>Prohibited</p>
<p><b>Minnesota</b></p>	<p>Election year limits: \$2,000/gub candidate \$500/leg candidate</p> <p>Non-election year limits: \$500/gub candidate \$100/leg candidate</p> <p>Aggregate contributions from PACs, lobbyists, political funds and individuals who contribute or loan more than 1/2 the yearly contribution limits cannot exceed 20% of spending limits. For 2007, those amounts were: \$95,800/gub candidate \$2,400/senate candidate \$1,200/house candidate</p> <p><i>All amounts are per calendar year.</i></p>	<p>Prohibited</p>
<p><b>Mississippi</b></p>	<p>Unlimited</p>	<p>\$1,000/candidate/calendar year</p>
<p><b>Nevada</b></p>	<p>\$5,000/candidate/election</p>	<p>\$5,000/candidate/election</p>

<b>New Mexico</b>	Effective 11/3/10: \$5,000/statewide candidate \$2,300/non-SW candidate  <i>Amounts are per election.</i>	Effective 11/3/10: \$5,000/statewide candidate \$2,300/non-SW candidate  <i>Amounts are per election.</i>
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<p><b>New York</b></p>	<p>2011 Limits:</p> <p>Gub. Cand., Primary – Product of number of enrolled voters in candidate’s party in state (excluding voters in inactive status) x \$.005, but not less than \$6,500 or more than \$19,700 General - \$41,000</p> <p>Legis. Cand., Primary – \$6,500/senate candidate \$4,100/house candidate General – \$10,300/senate candidate \$4,100/house candidate</p> <p>Max. contribs. by individual limited to \$150,000 in the aggregate.</p> <p>Separate limits apply for contribs. from all family members in the aggregate. Limit is based on the formula of total number of enrolled voters on active status in the candidate’s party in the state x \$0.025. For legislative candidates, this amount may not exceed \$100,000.</p> <p>“Family” is defined as a child, parent, grandparent, brother, sister, and the spouses of those persons.</p> <p><i>All amounts per election cycle.</i></p>	<p>Corporations are limited to \$5,000 per year in aggregate contributions to NY state candidates and committees.</p>
<p><b>North Carolina</b></p>	<p>\$4,000/candidate/election</p>	<p>Prohibited</p>

<p><b>Rhode Island</b></p>	<p>\$1,000/candidate or \$2,000/candidate if candidate qualifies for public funding and agrees to abide by spending limits.</p> <p><i>Both amounts are per calendar year.</i></p> <p>Individuals limited to \$10,000 in aggregate contributions to candidates, PACs and party committees per year.</p>	<p>Prohibited</p>
<p><b>Utah</b></p>	<p>Unlimited</p>	<p>Unlimited</p>
<p><b>Vermont</b></p>	<p>\$1,000/candidate/election</p> <p>Contributions from immediate family members are unlimited.</p>	<p>\$1,000/candidate/election</p> <p>Contributions from immediate family members are unlimited.</p>

<p><b>Washington</b></p>	<p>Adjusted limits effective 6/1/2010:</p> <p>\$1,600/gub candidate \$800/legislative candidate</p> <p><i>Both amounts are per election.</i></p> <p>During the 21 days before the general election, no contributor may donate more than \$50,000 in the aggregate to a statewide candidate or \$5,000 in the aggregate to any other candidate. This includes a candidate's personal contributions to his/her campaign. This does not apply to the state committees of the Democratic and Republican parties.</p>	<p>Prohibited for corporations not doing business in Washington state.</p> <p>Same as individual limits for Washington corporations:</p> <p>\$1,600/gub candidate \$800/legislative candidate</p> <p><i>Both amounts are per election.</i></p> <p>During the 21 days before the general election, no contributor may donate more than \$50,000 in the aggregate to a statewide candidate or \$5,000 in the aggregate to any other candidate. This includes a candidate's personal contributions to his/her campaign. This does not apply to the state committees of the Democratic and Republican parties.</p>
<p><b>West Virginia</b></p>	<p>\$1,000/candidate/election</p>	<p>Prohibited</p>

<p><b>Washington, D.C.</b></p>	<p>\$2,000 per candidate for mayor/shadow senator/shadow representative</p> <p>\$1,500 per candidate for chairman of the council</p> <p>\$1,000 per at-large council candidate</p> <p>\$500 per candidate for the Board of Education and/or Ward Council member</p> <p>\$200 per candidate for the Board of Education “elected from a school district or for an official of a political party” \$25 for a candidate of an Advisory Neighborhood Commission</p> <p>Contributions are unlimited when it comes to supporting or opposing initiatives or referendum measures</p> <p>Contributions cannot exceed \$8,500 per election cycle in Washington, D.C.</p>	<p>\$2,000 per candidate for mayor/shadow senator/shadow representative</p> <p>\$1,500 per candidate for chairman of the council</p> <p>\$1,000 per at-large council candidate</p> <p>\$500 per candidate for the Board of Education and/or Ward Council member</p> <p>\$200 per candidate for the Board of Education “elected from a school district or for an official of a political party” \$25 for a candidate of an Advisory Neighborhood Commission</p> <p>Contributions are unlimited when it comes to supporting or opposing initiatives or referendum measures</p> <p>Contributions cannot exceed \$8,500 per election cycle in Washington, D.C.</p>
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**\*Source:** Information taken directly from The National Conference of State Legislatures “State Limits on Contributions to Candidates 2011-2012 Election Cycle”

**\*\*Source:** Washington, D.C. information from District of Columbia Office of Campaign Finance.