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THE "CORPORATE POWER RESET": AN EXISTENTIAL THREAT TO CIVIL SOCIETY

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Can you imagine the civil rights movement without the NAACP? Or the gun rights movement without the NRA? A labor rights movement without unions?

When Americans want to change the world to better reflect their values, they form groups with like-minded citizens. These associations – most of which are legally organized as nonprofit corporations – are an integral part of the vibrant tapestry of American democracy. They allow citizens to amplify their voices and hold government leaders accountable. They also protect their individual members from retaliation and blowback.

A proposal called the "Corporate Power Reset" aims to prohibit nonprofits, businesses, unions, and other entities from speaking about elections and public policy. In their place, PACs, politicians, and the media would gain a stranglehold over public discourse. This report traces the origins of the "Corporate Power Reset," examines proposals introduced around the country in the 2026 legislative session, and explains why they imperil constitutional rights and the freedom of Americans to advocate through the associations of their choosing.

EXECUTIVE SUMMARY

- **The "Corporate Power Reset" strips foundational First Amendment rights from associations of Americans.** The proposal is intentionally sweeping, revoking First Amendment protections for participation in "ballot-issue activity" and "election activity" by businesses, labor unions, churches, nonprofit charities, think tanks, advocacy groups, trade associations, LLCs, and other entities.

- **Groups with private donors will lose their voice in the political process.** The plan forces speech about candidates, elected officials, ballot measures, and policy issues into the campaign finance system, where speakers are subject to extensive registration, reporting, and donor exposure requirements.

- **The threat is spreading aggressively, thanks to a well-funded and well-coordinated campaign.** Inspired by a 2025 proposal from the Center for American Progress, versions of the "Corporate Power Reset" have already appeared in 20 states – either via traditional legislation, legislatively-referred constitutional amendment, or proposed ballot measure. One state, Hawaii, has already enacted the plot into law, where it now faces a First Amendment challenge in court.

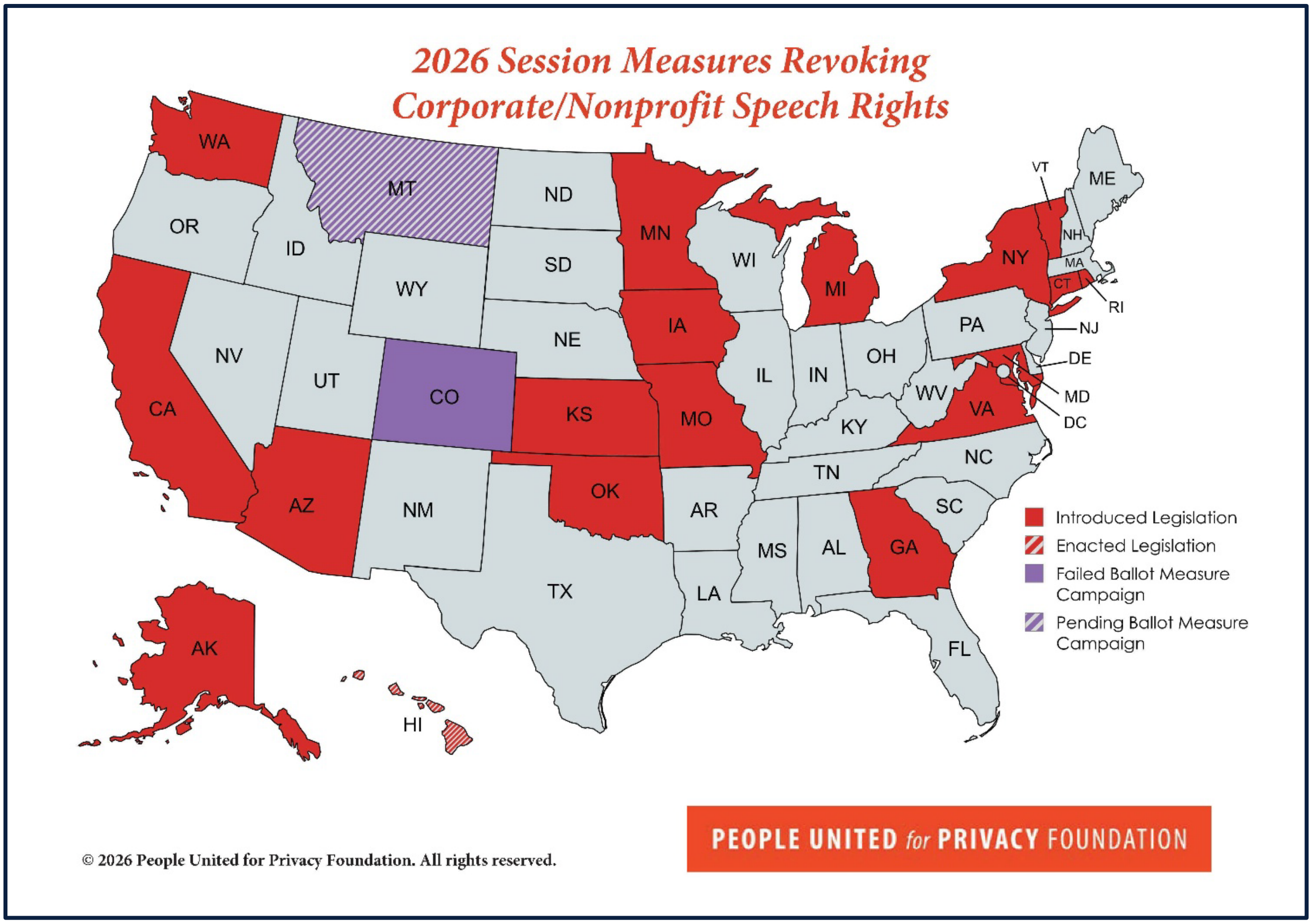
- **Wealthy individuals win, while groups of Americans lose.** By stripping constitutional protections from associations of Americans, the proposal would advantage America's wealthiest individuals, whose speech cannot be limited legally by legislation or state constitutional amendment. Politicians and media corporations, which are exempt from the scheme's restrictions, would also benefit.

- **The U.S. Supreme Court was clear in *Citizens United*: Corporations have First Amendment rights.** States cannot evade longstanding protections for private association and corporate speech with a gimmick. Whether for-profit or nonprofit, incorporated entities possess First Amendment rights as collections of individual citizens.

- **The proposal sets a perilous precedent for revoking constitutional rights.** If states can condition incorporation on surrendering First Amendment rights, they can attack other constitutional protections – religious liberty, lobbying, legal advocacy, the right to manufacture firearms, and more will be vulnerable.

LEGISLATIVE SURVEY: A SUDDEN EXPLOSION OF ACTIVITY IN 2026

The 2026 legislative session was distinctive for a disturbing and unexpected burst of interest among state lawmakers in proposing legislation to strip corporate entities – including think tanks, advocacy nonprofits, labor unions, and trade associations – of any First Amendment right whatsoever to opine directly or indirectly on elected officials, state government affairs, or issues on the ballot.[1] Inspired by the Center for American Progress (CAP) and often short-titled the “Corporate Power Reset,”[2] **34 such bills** were introduced in **18 states** as of July 2026. Activists attempted to pass this scheme via ballot measure in **two additional states**, Colorado and Montana. According to one proponent, exploratory campaigns are underway in **the remaining 30 states** to pass similar schemes in the future, whether through the legislative process or at the ballot box.[3]



The legislation is simplistic but devious. While representative measures have differed to a degree, most proposals include three pillars: (1) **key definitions** – namely, “artificial persons,” “ballot-issue activity,” and “election activity”; (2) a **prohibition** on every conceivable type of corporate entity from engaging in broadly defined “ballot-issue activity” or “election activity” as a condition of its license to operate within the state; and (3) a **death sentence** requiring any corporation to be dissolved for violating the aggressive ban on exercising these “powers.”

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[1] *See* Heather Lauer, “Tocqueville’s Nightmare,” *RealClearPolicy*. Available at: https://www.realclearpolicy.com/articles/2026/06/29/tocquevilles_nightmare_1191462.html (June 29, 2026). *See also* PUFPF Staff, “PUFPF’s Right to Participate Project Defends Free Speech Against Existential Threat,” People United for Privacy Foundation. Available at: https://unitedforprivacy.com/pufpfs-right-to-participate-project-defends-free-speech-against-existential-threat/ (June 11, 2026).

[2] Tom Moore, “The Corporate Power Reset That Makes *Citizens United* Irrelevant,” Center for American Progress. Available at: https://www.americanprogress.org/article/the-corporate-power-reset-that-makes-citizens-united-irrelevant/ (Sept. 15, 2025).

[3] “State-by-State Impact,” Transparent Election Initiative. Available at: https://transparentelection.org/find-your-state (2026). Some states labeled “Exploration” by the Transparent Election Initiative lack introduced or active legislation.

The term **"artificial person"** is typically defined in a manner that covers every type of corporate entity: for-profit corporations, all types of nonprofit organizations, limited liability companies, partnerships, trusts, other state-specific entities, and even unincorporated associations. Further, such bills frequently stipulate that out-of-state corporations that transact business or hold property in a state are deemed to be in-state corporations for purpose of the measure's applicability. The term **"ballot-issue activity"** is generally described as "paying, contributing, or expending money or anything of value to support or oppose a ballot question or initiative." Finally, the term **"election activity"** is routinely defined as "paying, contributing, or expending money or anything of value to support or oppose a candidate, political party, or political committee." Some measures also substitute the terms "ballot-issue activity" and "election activity" for the catch-all term "**political spending power**."[4] These terms are purposefully regulated expansively to prohibit even "indirect" support or opposition, leaving minimal room for nonprofits to advocate on issues or legislation that may be associated with candidates or ballot measure campaigns. Regardless of the specific language used, only one group is afforded an explicit carve-out: **media companies**. In effect, all entities are subject to draconian restrictions on engaging in First Amendment-protected speech, save for news media corporations.

These proposals threaten nonprofit donor privacy as well as free speech. While the devastating impacts on speech are obvious, such schemes function as an end-run around donor privacy protections by forcing any group that wishes to speak about elections or public policy to register as a political action committee and publicly expose its members and donors. Though these schemes do not directly require donor disclosure, they revoke the speech and association rights that have been protected since our country's founding, whereby nonprofits have been allowed to participate in civic debates without putting their members and supporters in harm's way. The radicals championing these restrictions envision an America where the government decides not only who can speak but when participants in public debate can be forced to expose themselves and their supporters to surveillance, threats, and harassment.

In an environment where the "Corporate Power Reset" is the law of the land, a corporation would be prohibited from opining on ballot measures certain to impact its business model and its employees' jobs. A nonprofit would be banned from advocating on policy proposals central to its mission. And a labor union would be muzzled from advocating for candidates that support the interests of the union's members. As one critic of Hawaii's law noted: "A union can't pool member resources to weigh in on a county charter amendment. A nonprofit founded to educate the public about government accountability is barred from engaging in the very civic advocacy that defines its mission. The law could even treat an informal neighborhood environmental meetup as an 'unincorporated nonprofit association' and prohibit it from spending money in support of a ballot measure protecting open space."[5]

The following table captures all such bills that were introduced in the 2026 legislative session with an emphasis on each measure's type, treatment of nonprofits, most recent action, and current status.

[4] *See*, *e.g.*, Az. Leg. S.C.R. 1053. 57th Leg., 2d Reg. Sess. (2026). Available at: https://www.azleg.gov/legtext/57leg/2R/bills/SCR1053P.pdf (Feb. 5, 2026) and Mo. Gen. Assem. H.B. 3396, "Missouri Corporate Power Reset Act." 103d Gen. Assem., 2d Reg. Sess. (2026). Available at: https://documents.house.mo.gov/billtracking/bills261/hlrbillspdf/7035H.01I.pdf (Feb. 24, 2026).

[5] Bradley A. Smith, "I chaired the FEC. Hawaii's attack on Citizens United is dangerous." *The Washington Post*. Available at: https://www.washingtonpost.com/opinions/2026/07/01/hawaii-is-making-dangerous-bid-suppress-free-speech/ (June 30, 2026).

2026 Session Bills Modeled After CAP's "Corporate Power Reset"					
State[6]	**Bill Number**[7]	**Type**	**Covers Nonprofits?**	**Last Action**	**Status**
Alaska	H.J.R. 31	Constitutional Amendment	Implicitly	Referred to the House State Affairs Committee on April 20, 2026.	**DEAD**
Arizona	S.C.R. 1053	Constitutional Amendment	Implicitly	Read for a second time in the Senate on February 9, 2026.	**DEAD**
California	A.B. 1984	Legislation	Implicitly	Re-referred to the Assembly Banking and Finance Committee on April 20, 2026.	LIKELY DEAD
Colorado	I-413	Ballot Measure	Implicitly	Title Board votes 3-0 that it lacks jurisdiction to set title because the measure has multiple subjects on April 24, 2026.	**REJECTED**
Connecticut	S.B. 461	Legislation	Implicitly	Joint Government Administration and Elections Committee Favorable Report tabled for the Senate Calendar on April 9, 2026.	**DEAD**
Georgia	H.B. 1046	Legislation	Explicitly	Read for a second time in the House on January 29, 2026.	**DEAD**
	S.B. 600	Legislation	Explicitly	Read for a first time and referred to the Senate Ethics Committee on February 26, 2026.	**DEAD**
Hawaii	H.B. 2130/S.B. 2829	Legislation	Explicitly	Referred to the House Consumer Protection and Commerce Committee, House Judiciary and Hawaiian Affairs Committee, and House Finance Committee on January 28, 2026. (H.B. 2130) Read for a second time, passed as amended, and referred to the Senate Judiciary Committee on February 20, 2026. (S.B. 2829)	**DEAD/DEAD**
	S.B. 2471	Legislation	Explicitly	Signed by the Governor on May 14, 2026.	**ENACTED**
Iowa	S.J.R. 2004 → S.J.R. 2009	Constitutional Amendment	Implicitly	Senate State Government Subcommittee members assigned on January 22, 2026. (S.J.R. 2004) Senate State Government Subcommittee members assigned on February 12, 2026. (S.J.R. 2009)	**DEAD/DEAD**
Kansas	H.B. 2766	Legislation	Implicitly	Died in the House Elections Committee on April 10, 2026.	**DEAD**
Maryland	H.B. 1378	Legislation	Implicitly	Heard in the House Government, Labor, and Elections Committee on March 4, 2026.	**DEAD**

[6] State shading indicates partisan control in the 2026 legislative session: purple text where divided government is present, blue text for a Democratic-controlled body, and red text for a Republican-controlled body.
[7] Bill numbers separated by a slash (/) are formally designated as companion bills by their respective legislature. Bills numbers separated by an arrow (→) indicate that the higher-numbered bill is a successor bill. Bill numbers separated by a hyphen (-) are "Tie-Barred" together, a phenomenon unique to the Michigan Legislature in which all connected bills must be enacted for any individual bill to take effect.

State	Bill Number	Type	Covers Nonprofits?	Last Action	Status
Michigan	H.B. 6216-H.B. 6217-H.B. 6218	Legislation	Explicitly	Introduced, read for a first time, and referred to the House Election Integrity Committee on July 3, 2026. (H.B. 6216, H.B. 6217, H.B. 6218)	PENDING
	S.B. 1085-S.B. 1086-S.B. 1087	Legislation	Explicitly	Introduced and referred to the Senate Elections and Ethics Committee on July 2, 2026. (S.B. 1085, S.B. 1086, S.B. 1087)	PENDING
	H.J.R. Z/S.J.R. L	Constitutional Amendment	Explicitly	Introduced, read for a first time, and referred to the House Election Integrity Committee on July 3, 2026. (H.J.R. Z) Introduced and referred to the Senate Elections and Ethics Committee on July 2, 2026. (S.J.R. L)	PENDING
Minnesota	H.F. 3419/S.F. 4240	Legislation	Explicitly	Heard in the House Commerce Finance and Policy Committee on March 12, 2026. (H.F. 3419) Removed from the Senate Elections Committee agenda on March 10, 2026. (S.F. 4240)	DEAD/DEAD
	S.F. 4147	Legislation	Implicitly	Reported Do Pass as Amended by the Senate Judiciary and Public Safety Committee and re-referred to the Senate State and Local Government Committee on March 23, 2026.	DEAD
Missouri	H.B. 3396	Legislation	Implicitly	Referred to the House Emerging Issues Committee on May 15, 2026.	DEAD
	H.J.R. 160	Constitutional Amendment	Explicitly	Referred to the House Emerging Issues Committee on May 15, 2026.	DEAD
Montana	I-194	Ballot Measure	Explicitly	Submitted signatures pending verification by the Secretary of State as of July 2026.	PENDING
New York	A. 9233/S. 8613	Legislation	Explicitly	Referred to the Assembly Election Law Committee on January 7, 2026. (A. 9233) Referred to the Senate Elections Committee on January 7, 2026. (S. 8613)	DEAD/DEAD
Oklahoma	H.J.R. 1075	Constitutional Amendment	Explicitly	Read for a second time and referred to the House Rules Committee on February 3, 2026.	DEAD
Rhode Island	S. 2619	Legislation	Implicitly	Held for further study by the Senate Judiciary Committee on April 7, 2026.	DEAD

State	Bill Number	Type	Covers Nonprofits?	Last Action	Status
Vermont	H. 793	Legislation	Explicitly	Read for a first time and referred to the House Government Operations and Military Affairs Committee on January 28, 2026.	DEAD
	S. 322	Legislation	Explicitly	Heard in the Senate Judiciary Committee on March 12, 2026.	DEAD
Virginia	H.B. 1447	Legislation	Implicitly	Left in the House Labor and Commerce Committee on February 18, 2026.	DEAD
Washington	S.B. 6358	Legislation	Explicitly	Read for a first time and referred to the Senate Law and Justice Committee on March 9, 2026.	DEAD

Of the nearly three dozen bills that were introduced in the 2026 session, debates in three states – California, Colorado, and Hawaii – are instructive for what proponents attempted this session, how lawmakers and impacted parties responded, and in what manner these campaigns may develop in the future. The following case studies discuss each state's experience with such schemes in greater detail and paint a revealing picture of the battle that lies ahead for civic-minded Americans and the causes they support.

California A.B. 1984. In a state notorious for its hostility to donor privacy and nonprofit advocacy,[8] it's no surprise The Golden State considered a "Corporate Power Reset"-inspired scheme in the 2026 legislative session. The aptly numbered A.B. 1984 was introduced in mid-February and received a rare testimony-only hearing before the Assembly Banking and Finance Committee in early April. According to a nonpartisan committee staff analysis, the bill's sponsor, Assembly Member Chris Rogers (D), introduced the bill to "end the disastrous legacy the *Citizens United* ruling has had on elections in California," despite acknowledging that "its passage will not overturn *Citizens United*."[9] As explained below, *Citizens United* is a 2010 U.S. Supreme Court decision protecting the First Amendment right of corporations, including nonprofits, to speak openly about elections and political debates, so long as their spending is made independently of any candidate.[10] No wonder then that committee staff acknowledged the bill's framework was "wholly contradictory to current existing law."[11]

While A.B. 1984's revocation of speech rights for all "artificial persons" was radical enough, the measure contained a brazen and revealing intent statement. Proposed Sec. 14804(c) of the amended version of A.B. 1984 stipulated that, "[i]f any portion of this title is held invalid, it is the intent of the Legislature that an artificial person shall possess no powers at all rather than acquire political spending power."[12] Simply put, Assembly Member Rogers and the bill's cheerleaders would prefer all corporations – regardless of size or form – *cease to exist* rather than permit any nonprofit, labor union, or business to retain any First Amendment right to political speech. Perhaps that truly extreme proposition explains why opponents of the bill vastly outnumbered proponents. Notable critics of A.B. 1984 included the California Chamber of Commerce, National Federation of Independent Business (NFIB),

[8] *See* Alex Baiocco, "California Continues to Push the Envelope on Violating Privacy and Free Speech Rights," People United for Privacy. Available at: https://unitedforprivacy.com/california-continues-to-push-the-envelope-on-violating-privacy-and-free-speech-rights/ (March 20, 2024). *See also* Scott Blackburn, "2022 Free Speech Index: Grading the 50 States on the Freedom to Speak About Government," Institute for Free Speech. Available at: https://www.ifs.org/wp-content/uploads/2024/07/Free-Speech-Index-2022-08.pdf (Aug. 8, 2022).

[9] Desiree Nguyen Orth, "Assembly Banking and Finance Bill Analysis – A.B. 1984 (As Introduced)," California Legislature. Available at: https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202520260AB1984 (April 3, 2026) at 4 (emphasis added).

[10] *Citizens United v. FEC*, 558 U.S. 310 (2010). *See also*, Luke Wachob, "15 Years After Citizens United, Some Politicians Still Can't Handle Criticism," People United for Privacy. Available at: https://unitedforprivacy.com/15-years-after-citizens-united-some-politicians-still-cant-handle-criticism/ (Jan. 21, 2025).

[11] *See* note 9, *supra* at 9.

[12] Ca. Leg. A.B. 1984, as Amended in Assembly April 16, 2026. 2025-2026 Reg. Sess. (2026). Available at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202520260AB1984.

and over 20 trade associations.[13] Meanwhile, boosters of the measure were largely limited to the Center for American Progress and several local Indivisible chapters.[14] As of July 2026, the bill remains stalled in the Assembly Banking and Finance Committee, unofficially dead after failing to meet a policy committee reporting deadline.[15] While California's business, labor, and nonprofit community can breathe a sigh of relief for the moment, it's highly likely a successor measure will return in the 2027 session.

Colorado I-413. In the final days of 2025, Attorney General and current gubernatorial frontrunner Phil Weiser (D) co-authored an op-ed in *The Denver Post* with progressive Representative Javier Mabrey (D) urging lawmakers to introduce and pass a "Corporate Power Reset"-style bill in the General Assembly's forthcoming legislative session.[16] According to the authors, "[w]hile the measure cannot overturn *Citizens United*, it proposes the next best step, removing corporations' authority to engage in political activities in the first place."[17] For good measure, the authors acknowledged that "this measure will face challenges… in court."[18]

While no such bill materialized in the 2026 session, two individuals instead filed Initiative #413, a similar effort designed to curtail the First Amendment rights of corporations and nonprofits – so-called "artificial persons" in I-413's parlance – to participate in Colorado political and issue debates.[19] At I-413's initial hearing on April 15, 2026, the Colorado Ballot Title Setting Board, known informally as the Title Board, determined that the measure had a single subject by a 2-1 vote and approved the measure for circulation and signature-gathering.[20] Unique to Colorado, the Title Board, which is comprised of the Attorney General, Director of the Office of Legislative Legal Services, and the Secretary of State (or their designees), evaluates whether or not a measure has a single subject in accordance with state law and determines whether the language in the proposed ballot question accurately reflects the proposed statutory changes. While the Title Board cannot comment on the merits of a proposed initiative, a favorable decision from the Board is necessary before initiative petitions may be circulated.[21]

With the assistance of People United for Privacy Foundation, two Colorado-based objectors filed a petition for rehearing, arguing that the measure contained multiple subjects in violation of state law and was therefore ineligible to be placed on the November 2026 ballot.[22] On April 24, 2026, the Title Board revisited its erroneous initial decision and voted 3-0 that the body lacked jurisdiction to set a title because the proposed measure contained multiple subjects, effectively killing I-413 for the 2026 election cycle.[23] Preventing this dangerous initiative from advancing in 2026 is a significant victory, but likely a temporary one.

Hawaii S.B. 2471. Though CAP was ultimately successful in using Hawaii as a testing ground for their "Corporate Power Reset" policy in 2026, their path to victory was anything but simple. S.B. 2471 was introduced on January

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[13] *See* note 9, *supra* at 12.
[14] *Id*. at 11-12.
[15] *See* Office of the Secretary of the Senate and Office of the Assembly Chief Clerk, "2026 Tentative Legislative Calendar," California Legislature. Available at: https://www.senate.ca.gov/system/files/2026-04/2026-proposed-calendar-updated-march-2026.pdf (March 27, 2026). July 2, 2026 was the deadline for policy committees in both chambers to meet and report bills.
[16] Phil Weiser and Javier Mabrey, "The creative way Colorado can work around Citizens United to keep big money's corporate influence out of politics," *The Denver Post*. Available at: https://www.denverpost.com/2025/12/10/citizens-united-colorado-solution-big-money-out-politics/ (Dec. 10, 2025).
[17] *Id*. (emphasis added).
[18] *Id*.
[19] *See* "2025-2026 Initiative Filings, Agendas & Results: #413 Limits on Political Spending by Artificial Persons," Colorado Secretary of State. Available at: https://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/index.html (2026). *See also* "Initiative 2025-2026 #413 (Final) – Limits on Political Spending by Artificial Persons," Colorado Secretary of State. Available at: https://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/filings/2025-2026/413Final.pdf (April 3, 2026).
[20] "Results for Proposed Initiative #413," Colorado Ballot Title Setting Board. Available at: https://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/results/2025-2026/413Results.html (2026).
[21] *See* "What is the Title Board?" Colorado Secretary of State. Available at: https://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/aboutTitleBoard.html (2026).
[22] Kelly Maher. *Motion for Rehearing, In the Matter of the Title and Ballot Title and Submission Clause for Initiative 2025–2026 #413*. Colorado Title Setting Board, April 22, 2026 and Ted J. Trimpa. *Motion for Rehearing, In re: Title, Ballot Title, and Submission Clause for Initiative 2025 –2026 #413*. Colorado Title Setting Board, April 22, 2026.
[23] *See* note 20, *supra*.

22, 2026, heard eight times across four different committees, and was the subject of six conference committee meetings to iron out serious differences between the House and Senate. While votes in committee and on the House and Senate floor were lopsided in favor of the bill – a frequent occurrence in the heavily Democratic Hawaii Legislature – lawmakers were clearly concerned about the policy's detrimental impacts on corporate speech and dubious constitutionality.

At multiple hearings, Hawaii Attorney General Anne E. Lopez (D) repeatedly warned lawmakers about the myriad legal deficiencies inherent in CAP's experiment. In written testimony before the House Judiciary and Hawaiian Affairs Committee, the Attorney General conveyed that her office "strongly opposes" S.B. 2471, emphasizing that, in an attempt to evade the U.S. Supreme Court's holding in *Citizens United*, "this bill relies on an untested legal theory using an unprecedentedly dangerous mechanism—the *full* revocation of all corporate powers in the state—in defense of a theory that collapses in upon itself upon further examination."[24] Attorney General Lopez further cautioned lawmakers that "a legal challenge could result in substantial legal fees for the State's taxpayers."[25]

The Attorney General wasn't alone in her condemnation. The Hawaii Building & Construction Trades Council, a collection of 18 trade unions in the state[26]; International Union of Painters and Allied Trades, District Council 50, a group of five local unions[27]; and Plumbers and Fitters UA Local 675[28] all wrote separately to the House Judiciary and Hawaiian Affairs Committee to express their strong opposition to S.B. 2471 and its intent to silence the voice of unions in government affairs. For example, Plumbers and Fitters UA Local 675 wrote to "echo concerns raised by the attorney general's office related to constitutional concerns and [F]irst [A]mendment rights," noting "we represent the interests of individual members which are afforded certain rights under the First Amendment and believe this measure may infringe upon those rights to associate and have their interests fully and duly represented."[29] Local 675 further admonished lawmakers that, "although several states have considered similar legislation, no state in the nation has actually adopted such, indicating it may be untested and/or legally flawed."[30]

Indeed, just weeks after the bill was signed into law by Governor Josh Green (D), the Grassroot Institute of Hawaii, a Honolulu-based think tank, filed a lawsuit challenging what's now known as Act 11.[31] According to the Institute for Free Speech, the attorneys for Grassroot Institute, "[t]he lawsuit argues that Act 11 violates the First Amendment's protections of free speech, freedom of association, freedom of the press, and freedom of petition and assembly," further alleging "that key provisions of the law are unconstitutionally vague, leaving organizations unsure of where the line between lawful advocacy and prohibited activity lies."[32] As *The Wall Street Journal*'s Editorial Board warned: "Progressives hope the Hawaii law will be a blueprint to silence political speech they don't like, one state at a time. Proponents of a corporate speech ban are hoping to get an initiative on the November ballot in Montana, with other states to follow. The sooner Hawaii's law is struck down, the better."[33]

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[24] Anne E. Lopez, Christopher T. Han, and Christopher J.I. Leong, "Testimony of the Department of the Attorney General on S.B. No. 2471, S.D. 2, H.D. 1," Office of the Attorney General. Available at: https://www.capitol.hawaii.gov/sessions/session2026/Testimony/SB2471_HD1_TESTIMONY_JHA_04-08-26_.PDF (April 8, 2026) at 5-6.

[25] *Id*. at 7.

[26] Gino Soquena, "OPPOSITION to SB 2471 SD2 HD1 – Relating to the Powers of Artificial Persons," Hawaii Building & Construction Trades Council. Available at: https://www.capitol.hawaii.gov/sessions/session2026/Testimony/SB2471_HD1_TESTIMONY_JHA_04-08-26_.PDF (April 7, 2026) at 27.

[27] Jeffrey Masatsugu, "Senate Bill 2471, SD2, HD1 (Relating to The Powers of Artificial Persons)," International Union of Painters and Allied Trades, District Council 50. Available at: https://www.capitol.hawaii.gov/sessions/session2026/Testimony/SB2471_HD1_TESTIMONY_JHA_04-08-26_.PDF (April 7, 2026) at 29.

[28] "SB2471, S.D.2, H.D. 1, Relating to the Powers of Artificial Persons," The Plumbers and Fitters UA Local 675. Available at: https://www.capitol.hawaii.gov/sessions/session2026/Testimony/SB2471_HD1_TESTIMONY_JHA_04-08-26_.PDF (April 8, 2026) at 28.

[29] *Id*.

[30] *Id*.

[31] IFS Staff, "Free Speech Lawsuit Challenges New, Sweeping Hawaii Law That Would Silence Nonprofits and Civic Groups," Institute for Free Speech. Available at: https://www.ifs.org/news/free-speech-lawsuit-challenges-new-sweeping-hawaii-law-that-would-silence-nonprofits-and-civic-groups/ (June 6, 2026).

[32] *Id*.

[33] The Editorial Board, "Hawaii Tries to Redefine 'Corporation,'" *The Wall Street Journal*. Available at: https://www.wsj.com/opinion/hawaii-corporate-speech-citizens-united-first-amendment-252cb940 (June 28, 2026).

Hawaii's journey to passing S.B. 2471 in the 2026 legislative session is instructive. Despite stark legal and policy concerns from a prominent state official and several influential labor unions, lawmakers ultimately opted to pass S.B. 2471, and the Governor acted quickly to sign the bill into law. The prescient threat of litigation and detrimental impacts on representation for working Hawaiians were not enough to dissuade elected officials from acting brazenly to strip First Amendment rights from all corporations, nonprofits, and unions operating in The Aloha State. The fear that lawmakers in other states may follow the same dismissive path in the future is well-founded.

POLICY ANALYSIS: A FULL-THROATED ATTACK ON NONPROFITS OF ALL SHAPES AND SIZES

"Corporations, which are composed of human beings with First Amendment rights, possess First Amendment rights themselves."[34] As explained, Hawaii believes otherwise – and may soon be joined by Montana and nearly 20 other states across the nation where CAP's so-called "Corporate Power Reset" has been proposed in the legislature or is headed for the ballot.

These efforts are united in their reliance on a simple trick. They redefine a corporation as a thing that can't engage in constitutionally protected expression. Or, as Hawaii put it, a corporation may carry out all "lawful purposes and activities, excluding any power to directly or indirectly engage in election activity or ballot-issue activity."[35]

The targets aren't limited to multi-billion dollar for-profit corporations. Hawaii's law explicitly denies the First Amendment to nonprofit organizations – which means virtually every church, mosque, synagogue, think tank, advocacy organization, labor union, trade association, private cemetery, and veterans' group active in The Aloha State loses its First Amendment rights on July 1, 2027.[36] Punishments for engaging in constitutionally protected activity include suspension of a corporation's ability to operate, revocation of tax-exempt status, and forced dissolution, among other stark penalties.[37]

There are two exceptions: One for "bona fide news stories, commentary, or editorials distributed through" state-sanctioned means[38] and, ostensibly, one for complying with Hawaii's political action committee (PAC) laws – although it is somewhat unclear how a corporation could set up a separate political committee without running afoul of the prohibition on "indirectly engag[ing]" in "election activity" in the first place.[39] Given the antipathy of the proposal's authors to corporate political activity, that speech-chilling vagueness is likely a feature, not a bug.

What does such a sweeping attack on First Amendment rights for incorporated entities look like in practice? Five key consequences of this policy upheaval are immediately apparent.

Political discussion will be dominated by candidates, PACs, and America's ultra-wealthy. These proposals will shrink the country's robust and vibrant political debate to one dominated by Americans who are willing to be doxed through PAC disclosures. By eliminating constitutional rights for associations, the big winners will be the country's richest Americans whose individual spending is not – and cannot[40] – be limited by Hawaii's new law and its proposed counterparts in states around the country.

Complaints about nonprofit participation in election and policy debates inevitably lead to rules and regulations that render politics a game only for insiders. Titans of industry and repeat, established political players have nothing to fear. But the timid – who gain the power to effectively advocate through association with neighbors and like-minded Americans – will go silent.

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[34] *Moody v. NetChoice, LLC*, 603 U.S. 707, 746-47 (2024) (Barrett, J., concurring).
[35] 2026 Haw. Sess. Laws Act 11 §§ 8, 22 (formerly S.B. 2471, S.D. 2, H.D. 2, C.D. 2). Available at: https://www.capitol.hawaii.gov/sessions/session2026/bills/GM1111_.PDF.
[36] *Id.* §§ 21, 27.
[37] *Id.* §§ 23, 24.
[38] *Id.* §§ 4, 8, 17, 19, 22 (pluralization altered).
[39] *Id.* §§ 4, 6, 8, 10, 16-22.
[40] *Buckley v. Valeo*, 424 U.S. 1, 45–51 (1976).

The chilling effect will be profound. Under these measures, groups will lose legal protection for "directly or indirectly… paying, contributing, or expending money or anything of value to support or oppose a candidate, political committee, or political party."[41] Since corporate dissolution is at risk, the incentives are (quite intentionally) to stay as far away from that line as possible.

In practice, that means anything that even looks political will be avoided by any legally recognized association. Lobbying against the governor's signature legislation? That might indirectly affect his or her re-election chances. Promoting "family values" or "an inclusive society?" Even these generic appeals will be avoided rather than risk being accused of "indirectly" boosting the fortunes of either major political party.

Private association will cease to exist. The ultimate goal of these schemes is to force all speech related to candidates, elected officials, ballot measures, and policy debates into a highly regulated and granularly disclosed campaign finance regulatory regime. As one of the campaign's architects explained in an interview about the Hawaii law, "what the bill does is assures that every dollar in Hawaiʻi's politics is from a human being, that it's disclosed, and that… their name has to be attached to it."[42]

In practice, any group that refuses to organize itself as a PAC – and consequently, publicly disclose its members and financial supporters – is effectively barred from participating in the most direct and impactful forms of political and issue speech. Privacy in association isn't explicitly outlawed, unless you have something to say. Americans will either be forced to publicly expose their name, home address, employer, occupation, and contribution amount to public scrutiny – and all the harassment or worse that doing so may entail – or instead stay silent, refraining from civic engagement.

Such schemes invite partisan application. Proposals typically bestow enforcement powers on a state's attorney general.[43] In 43 states, the attorney general is a partisan, elected official.[44] That means a single, biased politician will decide what corporations live and die if they edge too close into "indirect election activity." Even the most conscientious public servant will be tempted to abuse that authority – and the unscrupulous will revel in it.

The cornerstone case on political association, *NAACP v. Alabama*, arose because of exactly that kind of political chicanery. Then-Attorney General John Patterson abused his state's incorporation laws as part of a "full-frontal attack on the NAACP" to energize his electoral prospects as "a champion to Alabama's white voters."[45] As a result, the NAACP ceased operations in Alabama – and Attorney General Patterson made his starring role in that outcome "a central component of his [successful] 1958 gubernatorial campaign."[46]

There's precious little evidence that, with the passage of nearly 70 years, partisan law enforcement officials have become angels. As just one example, the Hawaii law's limitation of corporate protections to media engaged in "bona fide" news is ripe for selective enforcement against any blogs or websites a state official detests.

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[41] *See* note 35, *supra* at § 4.

[42] Maddie Bender, "Here's what legislation on 'dark money' will do for Hawaiʻi," *Hawaiʻi Public Radio*. Available at: https://www.hawaiipublicradio.org/the-conversation/2026-05-12/heres-what-legislation-on-dark-money-will-do-for-hawaii (May 12, 2026). *See also* Victoria Eavis, "How unidentifiable donors are funding Montana's anti-dark money initiative," *Montana Free Press*. Available at: https://montanafreepress.org/2026/06/11/how-unidentifiable-donors-are-funding-montanas-anti-dark-money-initiative/ (June 11, 2026).

[43] *See*, *e.g.*, "Ballot Language for Initiative No. 194 (I-194)," Montana Secretary of State. Available at: https://sosmt.gov/wp-admin/admin-ajax.php?juwpfisadmin=false&action=wpfd&task=file.download&wpfd_category_id=139&wpfd_file_id=73640&token=4937985bf188ce0c6b5071e2bde04702&preview=1 (2026) at § 8(2).

[44] "Attorneys General – How Attorneys General Are Selected," MultiState Elections. Available at: https://www.multistate.us/elections/ag-101#selection (2026). In Hawaii, the attorney general is appointed by the governor and confirmed by the State Senate.

[45] Helen J. Knowles-Gardner, *The First Amendment to the Constitution, Associational Freedom, and the Future of the Country: Alabama's Direct Attack on the Existence of the NAACP*, 48 Seattle U. L. Rev. 1, 31 (2024) (internal quotation marks omitted).

[46] *Id.*

This ploy threatens more than just political privacy – it's a blueprint to steal any constitutional protection from any legally recognized association. Hawaii goes out of its way to call attention to its remarkable assertion of power: "The creation and continued existence of a corporation shall not be deemed a right but shall be a conditional grant of legal status by this State and shall remain subject to complete withdrawal at any time."[47] In other words, the political expression of PACs and the press are protected by grace, not right.[48]

If a state succeeds in what Hawaii is attempting to accomplish, it can stop any legally recognized association from engaging in religious expression,[49] lobbying,[50] producing firearms,[51] providing legal counsel to others,[52] or wielding any other fundamental right. At their core, these proposals make the astonishing claim that the ability for Americans "to pursue their lawful private interests privately and to associate freely with others in so doing" is wholly at the mercy of the state.[53]

CONSTITUTIONAL ANALYSIS: A RECKLESS AND LEGALLY INDEFENSIBLE PLOY

Thankfully, the Constitution squarely prohibits this effort.

These plans baldly seek to bypass the First Amendment's longstanding protection for collective speech. As the U.S. Supreme Court recognized long ago, "effective advocacy" requires associating with others, pooling resources, and forming organizations that amplify the speech of ordinary Americans.[54] Proponents of the "Corporate Power Reset'" seek to throw out a century's worth of protections for ordinary people. As explained, the main beneficiaries will be media corporations and wealthy individuals.

Their ostensible target is *Citizens United v. FEC*, one of the most discussed and least understood cases of the last century. *Citizens United* stands for the unremarkable proposition that the government "may regulate corporate political speech through disclaimer and disclosure requirements, but it may not suppress that speech altogether."[55] The law at issue made it a felony for any corporation to pay for certain types of political communications.

Citizens United was not Chevron. It was (and is) a nonprofit advocacy organization indistinguishable from any of the others that form American civil society. As the Court explained, under the law challenged in that case, it was a felony for the Sierra Club to run an ad "that exhorts the public to disapprove of a Congressman who favors logging in national forests," for the National Rifle Association to "publish[] a book urging the public to vote for the challenger because the incumbent U.S. Senator supports a handgun ban," or for the ACLU to "create[] a Web site telling the public to vote for a Presidential candidate in light of that candidate's defense of free speech."[56] This was simply because these groups are incorporated – like nearly every significant nonprofit organization.

That cannot be right, and the Court decided accordingly – without requiring any new insight. The Court noted "that First Amendment protection extends to corporations" and cited *twenty-three* prior cases for the proposition.[57] In one of the earliest, from 1948, the Court addressed "a labor union [that] endorsed a congressional candidate in its

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47 *See* note 35, *supra* at §§ 6, 10.
48 *But see NAACP v. Alabama*, 357 U.S. 449 (1958) (sourcing right of expressive association in the First and Fourteenth Amendments); *N.Y. Times Co. v. Sullivan*, 376 U.S. 254 (1964) (holding that the First Amendment requires heightened protection for criticism of public officials); *N.Y. Times Co. v. United States*, 403 U.S. 713 (1971) (underscoring the First Amendment's strong protection against government censorship before publication).
49 U.S. Const., amend. I.
50 *Id*.
51 U.S. Const., amend. II.
52 U.S. Const., amend. VI.
53 *NAACP v. Alabama*, 357 U.S. at 466.
54 *Id*. at 460.
55 *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 319 (2010).
56 *Id*. at 337.
57 *Id*. at 342.

weekly periodical."[58] The Court chose not to interpret an expenditure prohibition to reach that publication, noting that "the gravest doubt would arise… as to the federal expenditure prohibition's constitutionality."[59] The Court continued recounting that line of cases, explaining that "the Government may commit a constitutional wrong when by law it identifies certain preferred speakers."[60] In other words, "[i]n the realm of protected speech, the legislature is constitutionally disqualified from dictating the subjects about which persons may speak and the speakers who may address a public issue."[61] After all, it is not only the speaker who has a right to be heard – voters have a right "to obtain information from diverse sources," including corporations.[62]

In short, the Supreme Court has consistently explained that "[p]olitical speech is indispensable," and its "worth… does not depend upon the identity of its source, whether corporation, association, union, or individual."[63] At the same time, "[e]ffective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association."[64]

The "Corporate Power Reset's" proponents argue they can strip away the right to political association, but their argument is nothing more than a "sophistic twist" on this long-settled law.[65] Since most organizations are "artificial persons" created under state law, they reason, the state has unbridled authority to say what *powers* a corporation possesses. So, no one is stripping the *rights* of people to speak in association with others – merely declining to provide the *power* to speak politically to disfavored (that is, non-media) "artificial persons." The First Amendment isn't violated, they say, merely made "irrelevant!"[66]

This is not an especially clever ploy, as *Citizens United* expressly addresses the idea. The Court explained the futility of "distinguish[ing] wealthy individuals from corporations on the ground that state law grants corporations special advantages—such as limited liability, perpetual life, and favorable treatment of the accumulation and distribution of assets."[67] That is precisely the distinction the "Corporate Power Reset" wishes to draw. But the Court could not have been clearer, quoting the late Justice Scalia: "It is rudimentary that the State cannot exact as the price of those special advantages the forfeiture of First Amendment rights."[68]

In other words, far from sidestepping *Citizens United*, the plan runs headlong into its plain text.

This is, indeed, rudimentary as the "Corporate Power Reset" violates the longstanding rule against unconstitutional conditions on government benefits. The "powers, not rights" framing offered by these schemes' sponsors is the precise scenario the "unconstitutional conditions doctrine" forbids. That rule provides that the government "may not deny a benefit to a person on a basis that infringes his constitutionally protected interests—especially, his interest in freedom of speech," even when there is no right to the benefit.[69] The whole purpose of the doctrine is to prevent governments from achieving indirectly (through conditioned grants, licenses, and benefits) what they cannot do directly. Relabeling a regulation of First Amendment activity as the withholding of corporate power does not change this analysis.

There are many examples. To take a clear analog, in *Donald v. Philadelphia & Reading Coal & Iron Co.*,[70] the Court held that the state of Wisconsin exceeded its authority by revoking the business licenses of foreign corporations that exercised their federal right of removal (*i.e.*, the right to have some claims heard in Federal court). In other

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[58] *Id*. at 343, *citing United States v. CIO*, 335 U.S. 106 (1948).
[59] *Id*. (internal brackets omitted).
[60] *Id*. at 340.
[61] *Id*. at 347, *quoting First Nat'l Bank of Bos. v. Bellotti*, 435 U.S. 765, 784-85 (1978).
[62] *Id*. at 341.
[63] *Id*. at 349, *quoting Bellotti*, 435 U.S. at 777 (internal quotations omitted).
[64] *NAACP v. Alabama*, 357 U.S. at 460.
[65] *Cao v. Federal Election Comm'n*, 688 F. Supp. 2d 498, 534 (E.D. La. 2010).
[66] *See* note 2, *supra*.
[67] *Citizens United*, 558 U.S. at 350-51, *quoting Austin v. Mich. Chamber of Commerce*, 494 U.S. 652, 658-59 (1990) (internal quotations omitted).
[68] *Id*. at 351, *quoting Austin*, 494 U.S. at 680 (Scalia, J., dissenting).
[69] *Perry v. Sindermann*, 408 U.S. 593, 597 (1972).
[70] 241 U.S. 329, 332 (1916).

words, a state cannot use a corporate license as leverage to extract a waiver of a constitutionally protected forum. *Speiser v. Randall* reached the same conclusion in the tax context: California could not condition a property tax exemption on a loyalty oath because the tax exemption was being used to penalize protected speech.[71]

Proponents' reliance on *Bank of Augusta v. Earle*[72] and the *ultra vires* doctrine[73] does not rescue these measures. States retain broad authority to define the powers of the entities they charter, but that authority is itself bounded by the Constitution. A state cannot define corporate powers in a way that, in operation, requires every corporation to forfeit a First Amendment right as the price of legal existence. The "powers" framing does not insulate the measure from First Amendment review; rather, it makes the unconstitutional condition more sweeping, because the right is forfeited not by individual transgression but as a structural condition of existing as a corporation within the state at all.

As the Supreme Court has explained, "[i]f the First Amendment has any force, it prohibits Congress from fining or jailing citizens, or associations of citizens, for simply engaging in political speech."[74] There is no clever trick for dodging that central protection. Nor should we wish for one.

CONCLUSION

In seeking to bypass *Citizens United*, the Center for American Progress has concocted a plan that would censor virtually all of civil society and serve as a dangerous template for revoking other constitutional rights from groups of Americans. Their plot's rapid spread to 20 states in under a year reflects the deep desire in some circles to silence critical voices and control discussions about candidates and elected officials' records and policy preferences.

Despite clear Supreme Court precedents upholding First Amendment protections for association and corporate speech, the "Corporate Power Reset" presents existential risks to civil society and donor privacy. While litigation targeting these laws is certain, the legal process can be costly and time-consuming, and success is never guaranteed. In the meantime, countless Americans will have their rights violated and their voices silenced in critical elections and policy debates. Inevitably, many organizations will choose not to speak, leaving the citizens and communities they represent vulnerable and voiceless.

It is incumbent upon all Americans – especially leaders of nonprofit, civic, and other incorporated entities from across the political and ideological spectrum – to forcefully oppose this radical plan and uplift the First Amendment rights of every American to support the causes they believe in through the nonprofits of their choosing.

[71] 357 U.S. 513 (1958).
[72] 38 U.S. 519 (1839).
[73] *See* note 2, *supra*.
[74] *Citizens United*, 558 U.S. at 349.

ABOUT THE RIGHT TO PARTICIPATE PROJECT

In June 2026, People United for Privacy Foundation (PUFPF) officially launched the Right to Participate Project, a national initiative dedicated to defending the First Amendment rights of Americans to speak, associate, and participate in civic life through the organizations of their choosing.[75]

The Right to Participate Project is laser-focused on a new and brazen plot to strip Americans of their ability to join together and make their voices heard through the organizations they create and support. Through legislation and ballot initiatives, activists are pursuing a sweeping effort in red, blue, and purple states to revoke the free speech rights of incorporated entities, threatening the ability of citizens to work collectively in support of causes, candidates, ballot measures, and public policy reforms.

This new threat to free speech and donor privacy was announced in 2025 by the Center for American Progress as "CAP's Plan to Beat *Citizens United*."[76] The proposal exempts news media corporations but prohibits other incorporated entities – including think tanks, advocacy nonprofits, labor unions, and trade associations – from engaging in any so-called "election activity" or "ballot-issue activity." These terms are purposefully defined broadly to prohibit even "indirect" support or opposition, leaving minimal room for nonprofits to advocate on issues or legislation that may be associated with candidates or ballot measure campaigns.

CAP's coordinated effort to promote these restrictions on civic participation has produced quick results. While individual efforts are often referred to formally as the "Corporate Power Reset Act" (or informally as the "Montana Plan"), versions of the proposal have already appeared in 20 states. One such measure has already been enacted into law in Hawaii, where it is being challenged in federal court as a violation of the First Amendment's protections for freedom of speech and association.[77] Some proposals take the form of ballot initiatives, while others are introduced as traditional legislation or legislatively-referred constitutional amendments.

PUFPF has responded forcefully. In Colorado, PUFPF successfully challenged a proposed ballot measure modeled on these restrictions, preventing it from reaching voters after state officials determined it violated Colorado's single-subject requirement.[78] PUFPF is also monitoring a similar measure from the Transparent Election Initiative, titled "The Montana Plan Act."[79]

These proposals threaten donor privacy as well as free speech. They function as an end-run around donor privacy protections, forcing any group that wishes to speak about elections or public policy to organize as a political action committee and publicly expose their donors. Though these schemes do not require donor disclosure directly, they revoke the speech and association rights that allow nonprofits to participate in civic debates without putting their members and supporters in harm's way.

PUFPF envisions a world where every American is free to support the causes they believe in, so that all sides of a debate may be heard, and no one faces censorship or retaliation for their views. The activists behind these restrictions envision a world where the government decides not only who can speak but when participants in public debate can be forced to expose themselves and their supporters to surveillance, threats, and harassment.

The Right to Participate Project will carry PUFPF's mission into this new and urgent fight to ensure that Americans remain free to join together, support the causes they believe in, and make their voices heard through the organizations they choose to support.

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[75] PUFPF Staff, "PUFPF's Right to Participate Project Defends Free Speech Against Existential Threat," People United for Privacy Foundation. Available at: https://unitedforprivacy.com/pufpfs-right-to-participate-project-defends-free-speech-against-existential-threat/ (June 11, 2026).

[76] Tom Moore, "Introducing CAP's Plan To Beat *Citizens United*," Center for American Progress. Available at: https://www.americanprogress.org/article/introducing-caps-plan-to-beat-citizens-united/ (Sept. 26, 2025).

[77] *See* note 31, *supra*.

[78] *See* note 20, *supra*.

[79] *See* note 43, *supra*.

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People United for Privacy Foundation *envisions an America where all people can freely and privately support ideas and nonprofits they believe in, so that all sides of a debate will be heard, individuals won't face retribution for supporting important causes, and all organizations maintain the ability to advance their missions because the privacy of their supporters is protected.*

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