PEOPLE UNITED *for* PRIVACY FOUNDATION

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2026 POST-SESSION REPORT:
FREEDOM OF ASSOCIATION PERSEVERES DESPITE MOUNTING PRESSURE FROM MULTIPLE DIRECTIONS

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The 2026 legislative session was characterized by a stellar defense of nonprofit donor privacy rights, but cracks are visible beneath the surface. **To date, no state has succeeded in passing legislation in 2026 that would *directly* compel nonprofits to expose their donor and member lists to government officials and the public.** However, several trends suggest that trouble is on the horizon, regardless of which party wields power in a state.

Nonprofits and donors face an increasingly complex threat environment, driven by a growing number of Republican-backed proposals attacking issue advocacy and seizing on heightened concern over perceived foreign influence in policy debates. At the same time, a new progressive scheme to strip First Amendment rights from corporations, including nonprofits, has opened yet another front in the long-running battle over the associational rights that function as connective tissue for a free society.

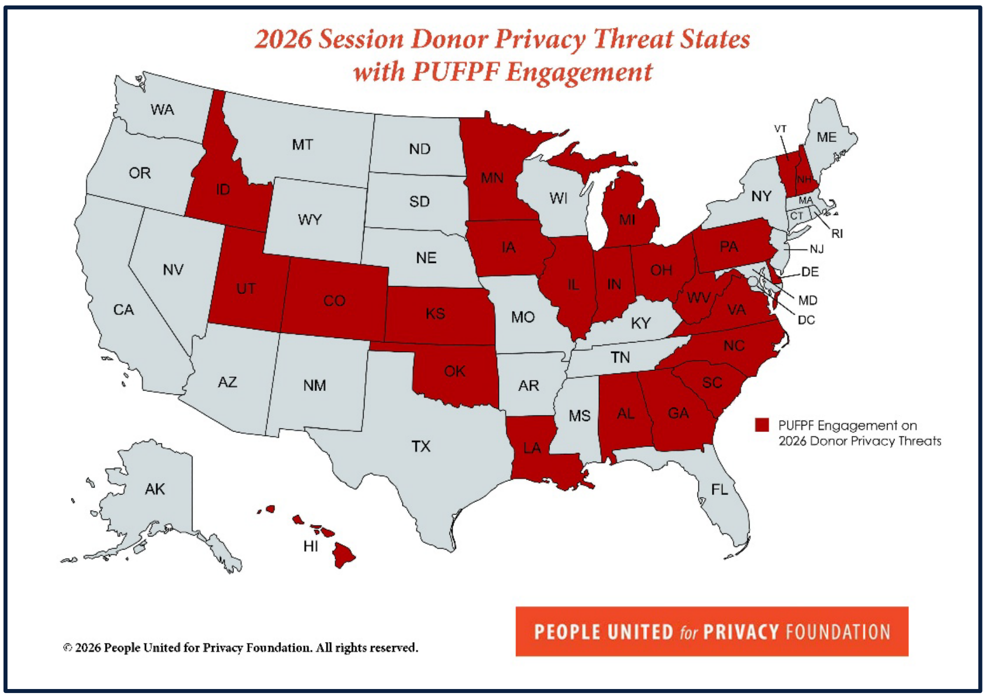
People United for Privacy Foundation (PUFPF) presents this Post-Session Report as an update on the threats and trends discussed in our 2026 Mid-Session Report. It categorizes threats into specific categories, examines key case studies for deeper insights, offers a look ahead at the most dangerous threats for 2027 and beyond – and celebrates several notable legislative victories that further cement privacy protections for nonprofits and their supporters.

EXECUTIVE SUMMARY

- **2026 Session In-Brief.** In all, **42 states** considered **172 bills** in the 2026 session, to date, that would have harmed nonprofit advocacy and/or violated donor privacy rights for nonprofits and their supporters. PUFPF engaged in **23 states** on **44 such bills**, ultimately defeating **100%** of nonprofit donor disclosure threats that were serious enough to warrant the organization's engagement this year.
- **Categorizing Disclosure Threats.** Retaliatory efforts targeting nonprofits for their policy advocacy or political speech constituted the bulk of disclosure hazards in 2026. Meanwhile, Arizona-style "original source" disclosure bills, which exploded on the scene in 2025, slowed slightly this year, but threats also emerged via opportunistic amendments or sloppy drafting in otherwise unobjectionable legislation. Concerns about foreign influence in elections and policy debates opened the door for many proposals that implicate nonprofit advocacy and donor privacy, creating another worrisome new threat environment.
- **Five Case Studies.** A sampling of representative threats from the 2026 session in **Alabama**, **Colorado**, **Delaware**, **Georgia**, and **North Carolina** offers a more detailed picture of the donor privacy landscape. These stories illustrate how politicians' anger at specific nonprofits menaces the entire sector.
- **Two Troubling Trends.** Some Republicans pushed measures designed explicitly to force nonprofits to expose their donors when discussing policy issues or speaking to the public about government affairs. Separately, a progressive ploy to strip First Amendment rights from all corporations, including nonprofits, exploded onto the scene in over 20 states.
- **Advancing and Defending Donor Privacy Protections.** **South Carolina** officials took decisive strides this year to advance PUFPF's signature Personal Privacy Protection Act model policy while privacy-minded lawmakers joined together to thwart an Attorney General-initiated threat to **Oklahoma**'s established law.
- **Campaign Finance Modernization Successes.** Lawmakers were active this session in passing increased disclosure thresholds to better protect donor privacy in a digital era rife with political violence. **Oregon** lawmakers went further, uniting to reform a problematic law that was harming the state's nonprofit sector.
- **Donor Address Redaction Reform Victories.** **Minnesota**, **Utah**, and **West Virginia** became the first 3 states to enact PUFPF's new model policy, the Protect Donors at Home Act, as momentum built elsewhere.

CALM AFTER THE STORM: CATEGORIZING 2026 SESSION NONPROFIT DONOR PRIVACY THREATS

Privacy and free speech have a longstanding symbiotic relationship. From the founding era to present day, engaged citizens have spoken to their fellow Americans using pseudonyms, unsigned editorials, and anonymous pamphlets – and by privately supporting countless causes active in communities around the country. Whether motivated by modesty, religion, or safety, Americans rely on their First Amendment right to privacy in association. Likewise, nonprofits of all shapes and sizes consider the privacy of their members and donors inviolable. Americans across the country depend on charities, policies formulated by think tanks, advocacy that enshrines those reforms into law, and unions and trade associations that continually champion their members' interests. Yet politicians in both major parties aggressively push a panoply of schemes designed to force the exposure of Americans' names, home addresses, and employers when they choose to donate to or join a nonprofit. Expose individuals' giving choices to public scrutiny, and not only will they opt to stay silent, but like-minded others witness the aftermath and follow suit. Sadly, the stakes are even higher in our digital age, where political violence is increasingly common.



Though **no direct donor disclosure bills became law**, the 2026 session saw **over 130 threats**. Despite this offensive, PUFPF achieved a **100% success rate** in thwarting serious disclosure attacks this year. Working with our national and state-based allies, PUFPF engaged on **44 bills** severely threatening nonprofit advocacy and donor privacy rights in **23 states**. Ultimately, for the second consecutive year, **zero harmful disclosure mandates were enacted** in 2026 – a remarkable achievement for the nonprofit community, civic-minded Americans, and freedom of association. Most threats PUFPF tracked and fought this session can be sorted into one of four categories. The specific bills[1] PUFPF monitored[2] in each grouping this year follow.

Retaliation and Retribution. Historically, most donor disclosure proposals emerge from a crude desire to retaliate against nonprofits that voice opinions in policy debates and comment on elected officials' voting records. Regardless of party, politicians cannot seem to resist agitating for retribution-inspired legislation that would force nonprofits to publicly expose their member and supporter lists. Some bills bluntly demand donor disclosure from organizations engaged in issue and/or political advocacy based on their tax-exempt status while others achieve the same goal by amending campaign finance laws to subject unsuspecting organizations to invasive donor disclosure mandates. Sadly, this phenomenon repeated itself yet again in 2026 across red, purple, and blue states. In all, PUFPF monitored **44 such threats** this session in **24 states**: **Alabama** (S.B. 220), **Arizona** (S.B. 1186), **California** (A.B. 1188), **Delaware** (H.S. 1 for H.B. 216, H.B. 392), **Georgia** (H.B. 1235, S.B. 423), **Idaho** (H. 719),

[1] Throughout this report, bill numbers separated by a slash (/) are formally designated as companion bills by their respective legislature. Bill numbers separated by an arrow (→) indicate that the higher-numbered bill is a successor bill while 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.
[2] Bill numbers formatted with *italicized text* have been signed into law or referred to the November 2026 ballot. Those followed by an asterisk (*) will carryover to the 2027 session, and bill numbers marked with a caret (^) were amended into a form that does not threaten donor privacy rights.

Indiana (S.B. 267), **Maryland** (H.B. 514/S.B. 4), **Massachusetts** (H. 806/S. 506, H. 812, H. 818, H. 850), **Michigan** (H.B. 4269-H.B. 4270), **Minnesota** (H.F. 72/S.F. 996, H.F. 1447/S.F. 1774), **Missouri** (H.B. 1904, H.B. 2204), **New Hampshire** (H.B. 1201), **New Jersey** (A. 734), **New York** (A. 910/S. 4266, A. 9067/S. 8475, A. 10097/S. 8445), **Ohio** (H.B. 250), **Oklahoma** (H.B. 3568), **Pennsylvania** (H.B. 374, H.B. 542/S.B. 11, S.B. 105), **Rhode Island** (H. 7977), **South Carolina** (S. 960), **Vermont** (H. 734), **Virginia** (S.B. 688), **Washington** (H.B. 2059), and **West Virginia** (H.B. 4848). Save for pending measures in **Michigan**, **New Jersey**, **Ohio**, and **Pennsylvania**, *all* of the aforementioned bills failed or were referred to interim study (**Massachusetts**).

Arizona-Style "Original Source" Disclosure. Inspired by Arizona's so-called "Voters' Right to Know Act" law, adopted via Prop 211 in 2022, "true" or "original source" disclosure schemes strongarm the exposure of nonprofit donors – and their donors' donors – when organizations engage in public policy discussions and legislative debates. Widely viewed as unconstitutional, Arizona's law attempts to bypass a 2021 U.S. Supreme Court ruling protecting donor privacy and may eventually force the justices to weigh in once more. While lower courts deliberate, the law's vague language and broad regulatory discretion pose severe risks for any nonprofit that opines on legislation or comments on candidates and elected officials alike. After spreading like a virus in the 2025 session, introductions of these odious and onerous ploys slowed ever so slightly in 2026. In all, **7 "original source" bills** materialized in **6 states** this session: **Alaska** (S.B. 64), **Hawaii** (H.B. 1478), **Illinois** (H.B. 5154), **Maryland** (H.B. 584), **Minnesota** (S.F. 905), and **North Carolina** (H.B. 788, S.B. 1086). Thankfully, all 7 bills died.

Opportunistic Politicians. Not all donor privacy threats are intentional or immediate. Some arise from sloppy drafting or problematic amendments attached to bills addressing campaign finance, lobbying, ethics, and related subjects. These bills must be evaluated on an individual basis to determine whether they put nonprofits and/or their donors at risk and closely monitored throughout their life cycle. PUFPF classified **29 such bills** in **19 states** this year: **Alaska** (S.B. 33), **Colorado** (S.B. 26-108 → S.B. 26-168), **Idaho** (S. 1365), **Illinois** (S.B. 150), **Iowa** (S.F. 2166), **Kansas** (H.B. 2512/S.B. 395 → S.B. 451), **Kentucky** (H.B. 172, H.B. 573), **Louisiana** (*H.B. 459*, *H.B. 540*, *H.B. 1036*), **Minnesota** (S.F. 3886), **Mississippi** (H.B. 1101/S.B. 2558), **New York** (A. 3092/S. 1910), **Oklahoma** (S.B. 1529), **Oregon** (*S.B. 1502*), **Rhode Island** (H. 7450), **South Carolina** (S. 813), **Utah** (H.B. 175), **Vermont** (*H. 686*), **Virginia** (H.B. 868*/S.B. 141, H.B. 982), and **West Virginia** (S.B. 98). A handful became law, but those that did pose no danger to longstanding nonprofit donor privacy protections in their enacted form.

Regulating Foreign Influence. Lawmakers in both parties have demonstrated sustained interest in targeting and regulating perceived "foreign influence" in American election and policy debates. Although often well-intentioned, poorly drafted measures can function in practice as infringements on the speech and privacy rights of *American donors to American nonprofits*, not foreigners. By their very nature, foreign donor reporting mandates extend new power to government officials to demand information on nonprofit donors for verification purposes with the likely outcome of harming donor privacy and chilling speech. For nonprofits, compliance can be difficult, if not impossible, and the risk of abuse from overzealous or biased regulators is real.

Legislation aiming to expose and/or ban foreign influence can be sorted into four categories: (1) **ballot question foreign donor bans**; (2) **"foreign-influenced corporation" spending bans**; (3) **Foreign Agents Registration Act (FARA) copycats and "foreign-supported political organization" (FSPO) regulation**; and (4) **miscellaneous measures regulating foreign giving**. The first and third categories tend to feature bills sponsored by Republicans while the second captures legislation proposed almost exclusively by Democrats. The fourth catch-all category includes proposals from members of both major parties.

PUFPF tracked **19 bills** banning direct and "indirect" donations from foreigners to ballot question committees – or nonprofits supporting ballot question committees – in **12 states** in 2026: **Arizona** (S.C.R. 1013, S.C.R. 1014), **Florida** (*H.B. 991*^), **Georgia** (H.B. 963), **Iowa** (H.F. 2044/S.F. 2078 → *H.F. 2601*/S.F. 2204), **Michigan** (H.B. 5197), **Minnesota** (H.F. 3340), **Nebraska** (L.B. 927, *L.B. 1075*), **New Hampshire** (*S.B. 534*^), **North Carolina** (H.B. 958^), **Oklahoma** (H.B. 3750/S.B. 1449), **West Virginia** (H.B. 4522), and **Wisconsin** (A.B. 906/S.B. 899). All the aforementioned bills mimic model policy that seeks to prohibit nonprofits with foreign donors over a certain threshold from participating in ballot measure debates. Only two measures were signed into law in **Iowa** and **Nebraska** while the rest either died, are pending (**Michigan**), or had the relevant language removed via amendment prior to passage (**Florida**, **New Hampshire**, **North Carolina**).

Legislation regulating and banning advocacy by so-called "foreign-influenced corporations" appeared in **6 states** this year: **Hawaii** (S.B. 1032, S.B. 2982), **Illinois** (H.B. 3071), **Massachusetts** (H. 875/S. 525), **New York** (A. 1258/S. 324), **Pennsylvania** (H.B. 497), and **Virginia** (S.B. 584). Of the **9 measures**, all are either dead, pending (**Pennsylvania**), or were referred for further study (**Massachusetts**). Most bills define a "foreign-influenced corporation" or "foreign-influenced business entity" as any company with as little as 1% of its equity owned by a foreign investor or 5% owned, in aggregate, by multiple foreign investors. American businesses that meet these sweeping conditions are prohibited from participating, directly or indirectly, in a spectrum of public communications about government and public policy. In addition to their intended impacts on businesses, nonprofits and trade associations that receive donations or collect membership dues from corporations face significant threats to their speech and privacy rights under these schemes as well. Fortunately, similar measures passed prior to 2026 in **Maine** (by ballot initiative) and **Minnesota** (via legislation) were ruled unconstitutional.

Continuing a worrying trend that began in 2025, state lawmakers are increasingly flirting with passing complex copycats of the Foreign Agents Registration Act. That federal law is notorious for imposing onerous registration, disclosure, and recordkeeping mandates on individuals and organizations engaged in an array of First Amendment-protected activity – including not merely lobbying for foreign governments but info sharing and event organizing. This wide scope has created a target-rich environment for regulators seeking to chill unwanted advocacy. Closely related efforts to pass model policy regulating so-called "foreign-supported political organizations" take the myriad problems with FARA and exacerbate them further, spelling doom for unsuspecting nonprofits. In total, **15 FARA or FSPO bills** were proposed in **8 states** this session. This year's **6 FARA-style bills** included: **Arizona** (S.B. 1100), **Kansas** (H.B. 2205), **New York** (A. 7852/S. 1774), and **Oklahoma** (S.B. 660, S.B. 960). All such bills died. **9 bills** of the FSPO variety were considered: **Florida** (*H.B. 905*^/S.B. 1178), **Georgia** (S.B. 177), **Indiana** (*S.B. 256*), **Kansas** (H.B. 2759), and **Tennessee** (H.B. 471/S.B. 317, H.B. 2549/S.B. 2235). Outside of **Indiana**, where S.B. 256 was regrettably signed into law, the remaining bills died or were amended (**Florida**) to remove the offending language pre-passage.

Finally, a number of bills targeting foreign influence were difficult to classify. While some serve as unique arrangements regulating or banning foreign gifts to nonprofits in specific contexts, others mirror the federal ban on foreign political giving and spending. Regardless of the exact form, PUFPF followed **14 proposals** in **8 states** in the 2026 session: **Alabama** (*H.B. 214*), **Arizona** (H.B. 2009, *H.C.R. 2001*/S.C.R. 1001, S.B. 1647, S.C.R. 1005), **Illinois** (H.B. 4630/S.B. 172), **Mississippi** (H.B. 571), **Oklahoma** (S.B. 2109), **South Dakota** (*S.B. 17*), **Washington** (H.B. 2123), and **Wisconsin** (A.B. 517/S.B. 520). Lawmakers in **Alabama** and **South Dakota** succeeded in passing appropriately narrow measures that echo the federal ban on foreign giving to political entities. Meanwhile, **Arizona** lawmakers advanced a legislatively-referred initiative for the November 2026 ballot that, among other things, prohibits foreign nationals from spending money to "influence" a state election. All other bills died.

VANQUISHING FREEDOM OF ASSOCIATION ATTACKS IN THE 2026 SESSION: FIVE CASE STUDIES

A regrettable and defining characteristic of donor privacy disputes is that nonprofits and their supporters lack peace of mind regardless of the party in power. From reliably conservative states like **Alabama**, to modern swing states like **Georgia** and **North Carolina**, and progressive strongholds like **Colorado** and **Delaware**, donor exposure threats were abundant this year. Five illustrative case studies highlight serious risks to donor privacy in three of the aforementioned categories this year and explain why each threat arose and how it was defeated.

Alabama (Retaliation and Retribution). Informed observers would be forgiven for assuming legislation that forces 501(c)(3) think tanks and 501(c)(4) advocacy nonprofits to expose their donor lists merely for discussing candidates and elected officials was the product of California progressives. To the contrary, that proposal was the shocking brainchild of long-serving Alabama Sen. Arthur Orr (R), who bluntly stated his view that "the public has the right to know" the identities of nonprofit donors. Introduced in late January, S.B. 220 quickly advanced out of a Republican-dominated committee just two weeks later and was placed on the Senate floor calendar the very next day. PUFPF sprung to action, producing a pointed analysis warning lawmakers – and the nonprofit community – of the bill's imminent threat to free speech and donor privacy. As our analysis concluded, "S.B. 220 purports to be aimed at preventing campaign donors from masking their identities by routing their contributions through intermediaries. However, Alabama law already prohibits this practice. The state should enforce the pre-existing law instead of enacting sweeping new restrictions that would unconstitutionally hinder nonprofit organizations' ability to engage in protected political speech – while sacrificing their supporters' privacy – in The Yellowhammer State." Thankfully, lawmakers heeded that warning, and the bill died quietly on the Senate Calendar, never receiving a vote until it was put to rest with two welcome words: "Indefinitely Postponed."

Colorado **(Opportunistic Politicians).** Some donor privacy threats aren't obvious at first glance. Others arise out of unique situations. And some, like S.B. 26-108 and its successor, S.B. 26-168, are both. Borne out of in-fighting between moderate and progressive factions in the Colorado Democratic Party (and buoyed by ethics complaints from the anti-privacy activists at Colorado Common Cause), these measures were introduced ostensibly to prohibit legislative caucuses from organizing as nonprofits without disclosing their financial supporters. In practice, however, both bills were sloppily and vaguely drafted. If enacted, nonprofits that count lawmakers as members, like the American Legislative Exchange Council and National Conference of State Legislatures – as well as, arguably, any organization that employs or contracts with Colorado's part-time lawmakers – would have been on the hook for publicly reporting every last donor on a monthly basis. As opposition to S.B. 26-108 intensified, S.B. 26-168 was introduced as a slightly revised successor bill in a failed effort to assuage complaints. Undeterred, both bills were eventually heard in a Senate committee late in the 2026 session. The initial bill was Postponed Indefinitely in a 4-1 vote, and its successor was also Postponed Indefinitely in a narrower 3-2 vote. Though cooler heads ultimately prevailed, what transpired this session is a classic example of a seemingly innocuous dispute in theory developing into a serious nonprofit donor privacy attack in practice.

Delaware **(Retaliation and Retribution).** The First State is better understood as "The Last State" when its hostile environment for speech and association is evaluated relative to its peers. Nonetheless, some Delaware lawmakers, led by Rep. Kimberly Williams (D), saw fit to make matters even worse this year by pushing an odious nonprofit donor disclosure bill with top-funder disclaimer mandates and pseudo-"original source" reporting requirements. Technically introduced very late in the 2025 session and carried over to the 2026 session, H.B. 216 languished for much of the spring until it was abruptly substituted as H.S. 1 for H.B. 216 in late April and scheduled for a hearing the following week. PUFPF sent a letter urging the House Elections & Government Affairs Committee to reject or table the bill, and the ACLU of Delaware echoed our concerns in testimony at the hearing, labeling the bill an unconstitutional "affront to associational privacy rights." Despite the legislation's status as a priority of Governor Matt Meyer (D), the substitute bill was reported with lukewarm support and subsequently stalled in the House Appropriations Committee, where it remained upon adjournment. As PUFPF explained, "H.S. 1 for H.B. 216 would apply indiscriminately to *all* organizations – regardless of whether they are focused on political activity – and would require the blanket outing of *all* donors (and even a donor's donors) – regardless of whether they gave for a political purpose and even if they expressly prohibit their funds from being used for a political purpose. Both of these aspects would make the Delaware law not only unconstitutionally overbroad, but also an outlier among outliers" relative to other states. Delawareans and the nonprofits they support can breathe a sigh of relief for now.

Georgia **(Retaliation and Retribution).** In a sign of just how topsy-turvy political debates have become, Republican lawmakers in Georgia set out to do the unthinkable this session: Openly emulate a sitting-duck Hawaii law by restricting giving from out-of-state sources to political candidates and nonprofit causes. Spurred by Georgia Republican Party anger over issue ads from an out-of-state source criticizing the Lieutenant Governor, the LG's allies in the General Assembly decided to retaliate in what's becoming a disturbing trend among GOP lawmakers.

First came S.B. 423, which sought to ban candidates, PACs, and "independent committees" – a regulatory construct that encompasses nonprofits – from receiving more than 50 percent of their total donations from "non-Georgia persons." As PUFPF has explained, these blatantly unconstitutional measures harm associational freedom and prevent a state's voters from hearing certain viewpoints. Many nonprofits are affiliated with national networks and receive both financial and institutional support from donors and organizations across the country. If state-based organizations with expertise in particular policy areas are suddenly required to choose between civic engagement and the resources that make effective advocacy possible, the end result will be a cross-ideological dampening of civil society as a whole. Not to be outdone, House Republicans introduced their own attack on non-Georgia speakers *and* nonprofit advocacy via H.B. 1235, which, in addition to targeting out-of-state donors, would have amended the definition of "independent committee" in existing law to encompass all issue-focused nonprofits. Thankfully, this brazen attack on issue advocacy and donor privacy went nowhere in the House.

To the contrary, S.B. 423 became a priority of Republicans in both chambers. The measure passed the Senate in a party-line vote with all but one Democrat opposed and advanced all the way to the House floor. A diverse coalition of organizations joined PUFPF in opposition, including American Federation for Children, Americans for Prosperity, Eternal Vigilance Action, GeorgiaCAN, and the National Federation of Independent Business. Thankfully, House Republicans were receptive and amended the bill to remove its application to "independent committees." With the very provision most animating the effort removed, House Leadership chose to table the bill, and it died on the floor – a mere House passage vote and Senate concurrence vote away from the Governor's desk.

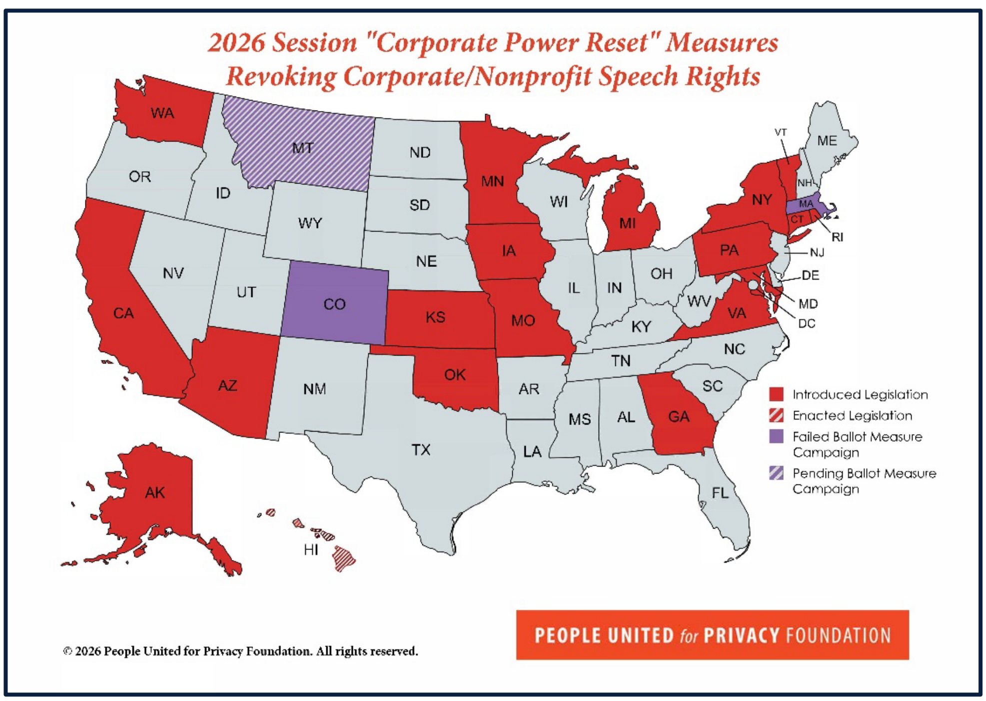
North Carolina (Arizona-Style "Original Source" Disclosure). Despite a legacy as the brainchild of progressives in Arizona and Washington, D.C., "original source" disclosure attacks are increasingly tempting conservatives. Enter North Carolina, where veteran Sen. Jim Burgin (R) filed S.B. 1086 in early June – a rudimentary "original source" disclosure measure clearly inspired by Arizona's Prop 211 abomination. Thanks to an outpouring of concern from a diverse nonprofit coalition, S.B. 1086 is unlikely to be considered during the remainder of the General Assembly's ongoing legislative session. Still, its emergence in a purple state with backing from a conservative lawmaker is yet another flashing warning light that the spread of Prop 211 is being fueled by politicians on both sides of the aisle in states across the country.

DANGER AHEAD: 2026 SESSION TRENDS THREATENING FREEDOM OF ASSOCIATION

Opponents of freedom of speech and association are nothing if not resilient. While threats persist from year to year and must always be challenged, most nonprofit donor disclosure mandates routinely fail. In response, anti-privacy activists and their political allies are increasingly hatching new ploys to pass nonprofit donor exposure schemes by ever more inventive means – often without the nonprofit community's awareness. The 2026 session was no exception. Two such trends were evident this year and signal what lies ahead in 2027 and beyond.

Republican-Sponsored Issue and Grassroots Advocacy Disclosure. While politicians in both major parties have sponsored, supported, or voted for nonprofit donor exposure bills over the years, Democrats have historically championed such measures in greater numbers. The 2026 session marked a concerning change – not just in the sponsorship of such bills but their explicit mandate for donor disclosure from nonprofits that interact with the public, not lawmakers (so-called "grassroots advocacy"), about policy issues affecting the lives of state residents. In all, PUFPF monitored and spoke out against **11 Republican-backed bills** in **11 states** that sought to compel donor disclosure for nonprofits engaged in issue and/or grassroots advocacy this session: **Alabama** (S.B. 220), **Georgia** (H.B. 1235), **Indiana** (S.B. 267), **Iowa** (S.F. 2166), **Missouri** (H.B. 2204), **Oklahoma** (H.B. 3568), **Pennsylvania** (S.B. 105), **Rhode Island** (H. 7977), **South Carolina** (S. 960), **Vermont** (H. 734), and **West Virginia** (H.B. 4848). Fortunately, outside of the pending **Pennsylvania** bill, the remaining measures failed.

For anyone prone to dismissing the seriousness of this growing threat to think tanks and advocacy nonprofits, consider the changes sought by some of the aforementioned bills. **Indiana** Republican Sen. Scott Alexander's S.B. 267 would have required detailed reporting, including donor disclosure, for nonprofits engaged in "influence campaigns" – defined, in part, as "an action or effort to mobilize or encourage members of the public to take action or to contact a legislative person or an executive person." No idle threat, S.B. 267 passed out of a Senate committee mere days after introduction in a 6-3 vote – with all Yes votes coming from Republicans – before stalling on the Senate floor due to an outpouring of opposition from the nonprofit community, including the ACLU of Indiana and the League of Women Voters, among others. Relatedly, **Oklahoma** Rep. Max Wolfley (R) and Sen. Micheal Bergstrom (R) championed H.B. 3568, which, as introduced, would have forced "advocacy organizations" – defined explicitly to include any nonprofit engaged in "public policy advocacy, legislative lobbying, issue advocacy, or political messaging" – to file disclosure reports with the state's campaign finance enforcer if they employ, honor, or award candidates or elected officials (or their immediate families). The bill was heard in the House Rules Committee but never received a vote. The **Vermont** threat, sponsored by Rep. Michael Boutin (R), may have been the most chilling. Short-titled the "Vermont Nonprofit Advocacy Transparency and Accountability Act of 2026," H. 734 attempted to command "nonprofit organizations that engage in advocacy, lobbying, and other activities that attempt to impact or influence public policy" to file quarterly donor disclosure reports with the Secretary of State for public consumption. Thankfully, lawmakers saw fit not to consider this egregious attack on civil society, and it was never scheduled for a hearing. From Republican-backed top-funder disclaimer proposals in **Pennsylvania** and **Rhode Island**, to a controversial nonprofit donor exposure mandate championed by **South Carolina** Senate Republican Leadership, and an appalling GOP-led DISCLOSE Act copycat in **West Virginia**, there were no shortage of threats looming this session. While it's reassuring that these bills either died (or have not advanced), odds are high that most, if not all, proposals will be reintroduced in 2027.



"Corporate Power Reset" Momentum. As PUFPF documented in a comprehensive report, the 2026 session was distinctive for a shocking burst of interest among lawmakers in brazen legislation to strip corporate entities – including think tanks, advocacy nonprofits, unions, and trade associations – of *any* First Amendment right to opine directly or indirectly on elected officials, government affairs, or issues on the ballot. Inspired by the Center for American Progress (CAP) and often short-titled the "Corporate Power Reset," this extraordinary attack on civil society spread like a virus this year.

As of September 2026, **35 copycat bills** were introduced in a staggering **19 states**: **Alaska** (H.J.R. 31), **Arizona** (S.C.R. 1053), **California** (A.B. 1984), **Connecticut** (S.B. 461), **Georgia** (H.B. 1046, S.B. 600), **Hawaii** (H.B. 2130/S.B. 2829, *S.B. 2471*), **Iowa** (S.J.R. 2004 → S.J.R. 2009), **Kansas** (H.B. 2766), **Maryland** (H.B. 1378), **Michigan** (H.B. 6216-H.B. 6217-H.B. 6218/S.B. 1085-S.B. 1086-S.B. 1087, H.J.R. Z/S.J.R. L), **Minnesota** (H.F. 3419/S.F. 4240, S.F. 4147), **Missouri** (H.B. 3396, H.J.R. 160), **New York** (A. 9233/S. 8613), **Oklahoma** (H.J.R. 1075), **Pennsylvania** (H.B. 2728), **Rhode Island** (S. 2619), **Vermont** (H. 793, S. 322), **Virginia** (H.B. 1447), and **Washington** (S.B. 6358). Leaving no stone unturned, activists attempted to pass this scheme via ballot measure in **3 additional states**:

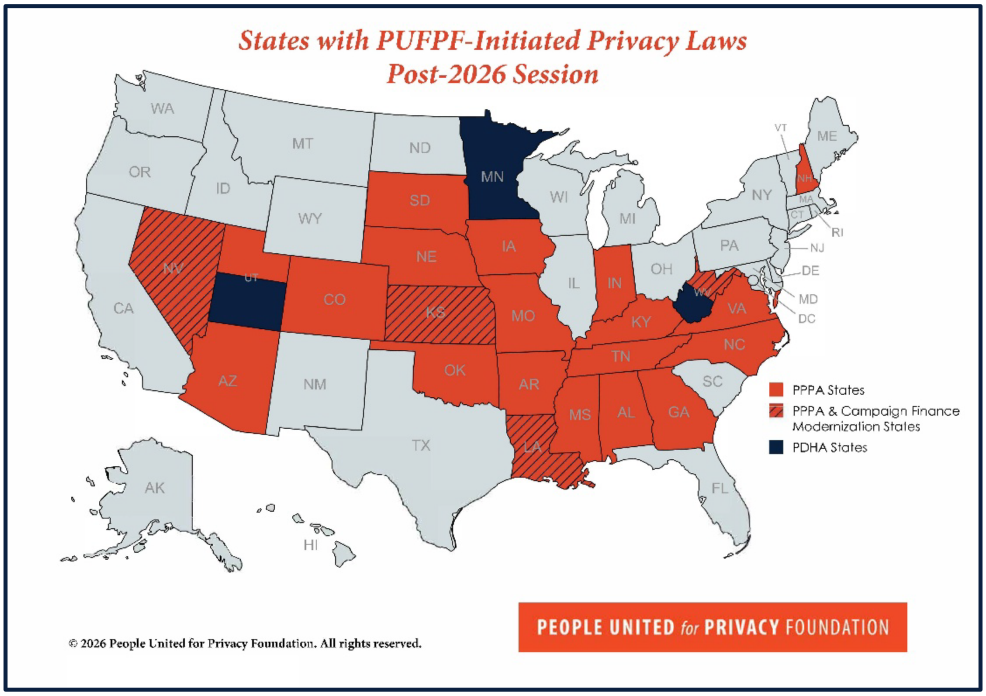
Colorado (I-413), **Massachusetts** (26-03), and **Montana** (I-194). Of the nearly three dozen bills that were introduced in 2026, only a **Hawaii** bill (now the subject of a First Amendment challenge) became law – though the **Michigan** and **Pennsylvania** bills are pending – while the **Montana** measure alone will go before voters in November. The **Colorado** petition was initially approved for circulation and signature gathering by the state's Title Board. With PUFPF's assistance, two Colorado-based objectors filed two motions for rehearing, arguing that the initiative text contained multiple subjects in violation of state law and was therefore ineligible to be placed on the November 2026 ballot. The Title Board revisited its erroneous initial decision and voted 3-0 that the proposed measure indeed contained multiple subjects, effectively killing I-413 for the 2026 election cycle. Similarly, the **Massachusetts** Attorney General declined to certify The Bay State initiative petition for signature gathering, deeming it a violation of the state constitution's free speech and peaceable assembly clauses. While those initial victories are encouraging, the fight continues. CAP has already begun boasting that their speech-chilling scheme will be introduced in as many as **30 states** in the 2027 session. According to another proponent, exploratory campaigns are underway in **the remaining 28 states** to pass similar measures next year.

CAP's scheme is simplistic but devious. While bills differ slightly from state to state, most proposals include three pillars: (1) **key definitions** – namely, "artificial persons," "ballot-issue activity," and "election activity" (or "political spending power"); (2) a **prohibition** on every conceivable type of corporate entity – for-profit businesses, all types of nonprofit organizations, unions, limited liability companies, partnerships, trusts, other state-specific entities, and even unincorporated associations and out-of-state nonprofits – from engaging in broadly defined "ballot-issue activity" and "election activity" as a condition of its license to operate within the state; and (3) a **death sentence** requiring the dissolution of any entity that violates the ban on exercising these "powers."

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. Indeed, the architect behind CAP's master plan acknowledges that's precisely the intent. By eliminating constitutional rights for associations of Americans, the big winners will be politicians, the media, and the country's wealthiest citizens whose individual spending is not banned. Given the stakes for corporate entities – namely, dissolution – the chilling effect will be profound. Businesses, nonprofits, and unions alike will be incentivized to disengage from public debates. Worse still, most proposals bestow enforcement powers on a state's attorney general – a partisan elected official in more than 40 jurisdictions. Even the most conscientious public servant will be tempted to abuse that authority, and the unscrupulous will revel in it. Ultimately, if the "Corporate Power Reset" succeeds, the precedent will be set that government can revoke other constitutional protections, too.

Thankfully, the Constitution squarely prohibits this charade. Its proponents bluntly seek to bypass the First Amendment's longstanding protection for collective speech. As the U.S. Supreme Court recognized nearly seven decades ago in *NAACP v. Alabama*, "effective advocacy" requires associating with others, pooling resources, and forming organizations that amplify the speech of ordinary Americans. Many Supreme Court decisions have since reiterated the First Amendment's safeguards for speech, regardless of its source. Precedent be damned, backers of the "Corporate Power Reset" seek to jettison a century's worth of protections for everyday citizens. While litigation challenging 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 election and policy debates in jurisdictions where these schemes become law. 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 these radical proposals and uplift the First Amendment rights of every American to support the causes they believe in through the nonprofits of their choosing.

PRIVACY FOR PEOPLE: ADVANCING AND DEFENDING THE PERSONAL PRIVACY PROTECTION ACT



Defeating threats to nonprofits and their supporters is critical, but it's only half the battle. It is equally important to pass proactive measures that prevent unscrupulous politicians and unaccountable government officials from accessing and/or publicizing nonprofit donor and member lists. Since 2018, PUFPF has been hard at work passing our signature model legislation, the Personal Privacy Protection Act (PPPA), in red, purple, and blue states around the country. As of September 2026, the PPPA is the law of the land in **22 states**, protecting privacy rights for **over 100 million Americans and the nonprofits they support**. This policy, which has received bipartisan and even *unanimous* support, prohibits state agencies and officials from making unwarranted demands for or disclosures of nonprofit members, supporters, and volunteers' personal information and stipulates penalties for careless or corrupt officials that expose Americans' private giving choices. As privacy opponents relentlessly attempted (and failed) to pass forced disclosure bills in 2026, PUFPF was successful in building momentum to pass the PPPA in **South Carolina** and quashed a brazen effort to weaken an existing PPPA law in **Oklahoma**.

South Carolina. In a legislative body that typically requires 2-3 years for a policy to proceed from initial introduction to settled law, the PPPA achieved tremendous progress in The Palmetto State this session. The PPPA was introduced in late January as H. 5075 by Rep. Travis A. Moore (R) with the support of 8 cosponsors. In late February, the reform measure received a favorable hearing in a House Judiciary Subcommittee and advanced to the full Judiciary Committee via a bipartisan 4-0 vote. In addition to PUFPF, supportive testimony came from a diverse array of national and state-based nonprofits, including Alliance Defending Freedom, Americans for Prosperity – South Carolina, and Philanthropy Roundtable, among others. A lone opponent, the South Carolina Press Association, testified in opposition, expressing the desire of their member media outlets to know the identities of nonprofit donors so they can be exposed to scrutiny in reporting. In other words, the Press Association made the case for why the PPPA's privacy protections are so critical.

Undeterred, the full committee met a month later and advanced the PPPA in another unanimous vote with all 21 members present voting in favor. House leaders wasted little time in bringing H. 5075 to the floor, where it again passed *unanimously* in a 115-0 vote with almost no debate and no amendments. Despite demonstrable widespread, bipartisan support inside and outside the Legislature, the Senate Judiciary Committee never scheduled a hearing on the bill, instead devoting time to other priorities. An outlier among its neighbors, South Carolina is long overdue to join its southern peers in enshrining the PPPA's privacy protections into law.

Oklahoma. Sooner State lawmakers united to pass the PPPA – the fifth state to do so – back in 2020 via H.B. 3613. That bill passed the House in an overwhelmingly bipartisan 77-13 vote and sailed through the Senate in another bipartisan 43-2 vote. Support was bipartisan outside the Legislature as well, as both the left-leaning ACLU and right-leaning Oklahoma Council of Public Affairs were vocal supporters of the PPPA. During debate on the House floor, the bill's sponsor, former Rep. Terry O'Donnell (R), explained the importance of the bill's privacy safeguards: "The First Amendment guarantees our right to engage in public discourse and to assemble freely, and this is basically preventing an AG or some state agency from collecting all the names of the members of the ACLU and then publishing that, deciding that there's some sort of an 'enemy of the state' kind of a situation… I think that this truly embodies the fabric and the content of the First Amendment."

Fast forward six years, and Rep. O'Donnell's comments became eerily prescient. The PPPA came under attack this session from Attorney General (and failed gubernatorial candidate) Gentner Drummond (R). Despite no observed issues with the law, AG Drummond persuaded an ally in the Legislature, veteran Sen. John Haste (R), to introduce S.B. 1535, which took a chainsaw to the PPPA's privacy protections. As introduced, the bill would have added four sweeping new exceptions to the law's protections, three of which were exclusively for the Attorney General's benefit. If allowed to pass, these carve-outs would have granted the AG virtually unfettered access to a nonprofit's donor or member list. What's clear is that the PPPA was functioning as intended by serving as a shield against politically motivated investigations of disfavored nonprofits. For AG Drummond, that was precisely the problem.

The bill was introduced in early February and heard in the Senate Judiciary Committee just two weeks later. The Committee held an extremely brief and surface-level hearing on the bill, and it was voted out of Committee in a party-line 6-2 vote with all Republicans in favor and all Democrats opposed. S.B. 1535 was quickly added to the Senate calendar, where it stalled for months due to intense opposition, led by PUFPF, and ultimately failed to meet a critical deadline for Senate passage. While this unexpected threat to the PPPA has been vanquished, it's a chilling reminder that partisan officials are eager to target and probe nonprofits with views they oppose. Thankfully, the PPPA stands in their way – but only if the nonprofit community stands in unison behind its protections.

REFORMING ANALOG AGE PRIVACY THREATS: CAMPAIGN FINANCE MODERNIZATION WINS

The Personal Privacy Protection Act, while critical, is just one essential tool for fortifying freedom of association. In recent years, states have also been active in reforming outdated – and often unconstitutional – laws that expose Americans' sensitive information when they support nonprofits engaged in public policy debates. Far too many state laws are byproducts of an analog era that never envisioned the modern dangers of online donor exposure.

PUFPF has been at the forefront, urging elected officials to review and reform their state's campaign finance and lobbying laws in response to the U.S. Supreme Court's 2021 *Americans for Prosperity Foundation (AFPF) v. Bonta* decision, which reaffirmed and reinforced the First Amendment right to privately support the causes of one's choice. A trailblazer in the field, **West Virginia** enacted a comprehensive update of its grassroots lobbying and campaign finance laws in 2023 via S.B. 508 and S.B. 516, bringing The Mountain State into compliance with *AFPF* and safeguarding donor privacy. In the 2025 session, **Kansas** (H.B. 2206), **Louisiana** (H.B. 693), and **Nevada** (A.B. 497) followed West Virginia's lead, passing bipartisan legislation that modernized campaign finance rules and regulations to strengthen advocacy and donor privacy protections for nonprofits – and their supporters.

The 2026 session was notable for an outpouring of activity among state lawmakers in rethinking and revising the **antiquated monetary thresholds** at which donors' personal information is reported to and made public by government agencies. In most states, contributing as little as $51 – or, in some states, *any amount* – to a candidate or political committee results in a donor's name and home address appearing in public, searchable government databases. Many states also list donors' employers and occupations in these datasets. Amid increasing concerns about politically motivated threats and violence, elected officials are wisely reconsidering and reforming overbroad donor exposure requirements. Look no further than **Oregon**, where lawmakers carefully narrowed a haphazard law this year in recognition of the havoc it was wreaking on The Beaver State's nonprofit community.

Disclosure Threshold Reform. In red, blue, and purple states, Republican and Democratic lawmakers took a keen interest this session in raising woefully outdated donor disclosure thresholds that left their constituents and supporters vulnerable to harassment and political violence. On June 1, **Louisiana** Governor Jeff Landry (R) signed the reform-minded S.B. 495 into law, raising all disclosure thresholds within The Pelican State's campaign finance code to $200. Previously, Louisiana publicly identified the name and home address of every individual giving over $50, and, in some instances, donors giving any amount were listed in state databases. Notably, the bill passed both chambers of the Legislature *unanimously*. Not to be outdone, Governor Landry also signed H.B. 459, a bipartisan bill that revises the state's "electioneering communication" definition to further ensure that nonprofits won't trigger campaign finance reporting requirements when engaging in issue advocacy. A few weeks after Louisiana's decisive action, **New Hampshire** Governor Kelly Ayotte (R) signed S.B. 405 into law. This reform legislation increases the threshold at which political giving requires public disclosure from $50 to $200 and raises the trigger for public reporting of a contributor's employer and occupation information from $200 to $1,000. As Rep. Clayton Wood (R) explained, "this bill strikes the proper balance between transparency and participation… It reduces administrative work for campaigns, removes a potential chilling effect on small donors who may be uncomfortable disclosing personal information for modest contributions, and brings reporting thresholds into alignment with the state's current campaign finance structure."

Blue states got in on the action, too. **Connecticut** successfully raised the reporting thresholds for paid communications that "refer to pending administrative or legislative action" and "solicitations" to the public to communicate with state employees about legislation and government action. Signed into law in May, H.B. 5532 raises the threshold at which such "expenditures" trigger lobbying reporting requirements from $50 to $100. While this law doesn't require donor disclosure, such "grassroots lobbying" regulations have a harmful impact on nonprofit civic engagement by exposing groups to investigations and costly compliance burdens when talking to the public about government affairs. Any reform that reduces privacy or advocacy burdens is cause for celebration.

Tangible momentum for reform was evident in two additional states as well. The **Arizona** Senate passed two bills (S.B. 1006 and S.C.R. 1002), the latter a legislatively-referred initiative, to protect the privacy of political donors giving less than $200. The current disclosure threshold is $100. While neither measure passed the House, it's clear that Arizona elected officials are taking seriously the need to safeguard civic engagement through commonsense privacy reforms. Meanwhile, a pending **New Jersey** bill sponsored by Sen. Joseph Cryan (D), S. 1431, includes language increasing a donor disclosure threshold for independent expenditure committees from $500 to $10,000. Through amendments to the "independent expenditure" definition, S. 1431 seeks to eliminate problematic donor disclosure requirements trigged by advocacy related to pending legislation or regulations as well.

Oregon. In an effort to ward off a 2024 ballot petition that would have imported Arizona's disastrous "original source" disclosure law, Oregon lawmakers worked with a broad coalition of advocacy organizations to advance compromise legislation that year that persuaded backers to withdraw their gambit. The rushed result still harmed privacy and associational rights, just not as severely as the ballot measure would have, and reserved the right for legislators to act in the future. The 2026 session presented just such an opportunity. State leaders, including Speaker Julie Fahey (D), House Majority Leader Ben Bowman (D), and Secretary of State Tobias Read (D), led a successful effort – with support from many Republicans – to delay and amend the law. H.B. 4018, which Governor Tina Kotek (D) signed into law on April 9, delays implementation of the 2024 law's disclosure requirements until 2031 and makes various clarifying and limiting amendments to its "original source" disclosure mandate. A laundry list of Oregon labor unions, trade associations, and civic groups supported the bill to protect their advocacy rights.

SECURING PRIVACY IN A DIGITAL ERA: EARLY VICTORIES FOR THE PROTECT DONORS AT HOME ACT

The specter of rising political violence has created new urgency around donor safety. Following targeted attacks on public officials in 2025, many states legislatures moved quickly to scrub lawmakers' home addresses from public databases. The same principle must now extend to citizens who support candidates or causes. In October 2025, People United for Privacy Foundation debuted the Protect Donors at Home Act (PDHA), our model policy that addresses this critical gap. Patterned after the bipartisan Federal Election Commission's unanimous priority legislative recommendation to Congress and existing laws in **California**, **Texas**, and **Wyoming**, the PDHA protects individuals' street names, street numbers, and employers from public disclosure in campaign finance reports. Though this sensitive information is still collected by state authorities, it's appropriately shielded from public view. The 2026 session saw early victories for the PDHA in **3 states** – **Minnesota**, **Utah**, and **West Virginia** – with demonstrable momentum in **3 additional states**: **Arizona** (S.B. 1743), **Massachusetts** (H. 848/S. 515 → S. 2935), and **South Carolina** (H. 5312 → H. 3570). More details on those three trendsetting 2026 session victories follow.

Minnesota. Perhaps it's fitting that Minnesota lawmakers united to pass a robust donor address redaction policy this session, given the tragic violence that shocked The North Star State and the country in the summer of 2025. On May 18, Governor Tim Walz (DFL) signed H.F. 4239 into law, which *retroactively* shields the street addresses of candidates, campaign staff, and donors from public disclosure in an array of state-mandated campaign finance and lobbying reports. Minnesota had been at the forefront of discussions about political violence following the appalling 2025 assassination of Speaker Emerita Melissa Hortman and her husband and the attempted assassination of Sen. John Hoffman and his wife. "Suffice it to say that public availability of home addresses of many legislators put our safety at risk in the heightened political environment we find ourselves in," explained Rep. Mike Freiberg (DFL) at a March hearing on an early iteration of his bill (H.F. 3363).

PUFPF supported the PDHA-style measure (and its predecessor), writing in a letter to Minnesota House leaders: "Especially in the wake of horrific acts of political violence in Minnesota and elsewhere, no state should be publishing online the precise locations of citizens' homes alongside their political donations. Campaign finance laws are meant to prevent corruption, not facilitate doxing, and ever-advancing information technology has changed the calculus surrounding public disclosure of sensitive location information." The final version passed the Senate 46-21 and the House 118-15. Both chambers approved the critical reform measure on a bipartisan basis.

Utah. Last September, Utah took center stage in the national conversation on political violence following the harrowing assassination of Turning Point USA Co-Founder and CEO Charlie Kirk at Utah Valley University. As Governor Spencer Cox (R) poignantly lamented in the aftermath of that tragedy, "the most American thing we can do is an act of political speech, and whether you agreed with what he said or you hated what he said, now it's harder for all of us to do that." While there's no simple solution to the threat of political violence and its detrimental impacts on freedom of speech, a new PUFPF-inspired law's safety-conscious protections for political donors will make a core act of political speech – contributing to campaigns – safer for Utahns who no longer need to fear being targeted at their homes for their opinions. Thanks to bipartisan privacy legislation signed March 19 by Governor Cox, Utahns' street numbers and names will no longer be published in internet-accessible state campaign finance records. The address redaction requirements in H.B. 450 are modeled upon those in the PDHA. The legislation received near-unanimous support in the Utah Legislature, passing 28-0 in the Senate and 66-1 in the House.

West Virginia. Following Governor Patrick Morrisey's (R) signing of S.B. 640 on March 2, West Virginia became the first state in the nation to adopt the Protect Donors at Home Act – *and* the first state to pass a trio of PUFPF-recommended reforms, including the Personal Privacy Protection Act and campaign finance modernization policy. Under the new law, the Secretary of State's Office will no longer publish individual donors' street addresses or employers alongside publicly available campaign finance data. S.B. 640 also protects this sensitive information from exposure in public record requests and imposes penalties on state agencies for non-compliance. The PDHA measure passed with overwhelming support in both the House of Delegates (78-17) and Senate (31-2) on the way to Governor Morrisey's desk. During floor debate, S.B. 640's Lead Sponsor, Sen. Mike Azinger (R), urged his colleagues to consider not only concerns surrounding political violence but also the politically motivated harassment and intimidation enabled by needlessly publicizing detailed information about where donors live and work: "You should be able to donate to somebody you believe in, or to a cause you believe in, in this state and in this country without having to be concerned about this kind of unjust retribution." S.B. 640 makes that ideal reality.

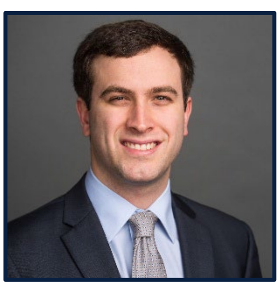
LOOKING AHEAD TO 2027

Hostility towards nonprofits and their donors following a heated campaign season has become a hallmark of post-election legislative sessions. Regardless of which party emerges victorious in 2026's many election contests, the nonprofit community should expect a heightened threat environment in 2027. In addition to the biannual increase in retaliatory disclosure bills, privacy advocates must also contend with a new generation of threats to associational freedom, including the "Corporate Power Reset" scheme, Arizona-style "original source" disclosure mandates, and an array of slapdash measures purportedly targeting foreign influence in policy debates.

While the threat environment grows ever more dangerous and dynamic, the prospects for proactive reform remain strong. Concerns about political violence, coupled with an increased, bipartisan awareness of how technological and cultural changes have exacerbated the harms of disclosure, continue to present opportunities to strengthen privacy protections and thwart invasive disclosure demands. As nonprofits and donors prepare for an existential defense of donor privacy and associational rights next year, they can continue to make inroads into improving the existing body of law that undermines these core values to the detriment of personal privacy, free speech, and civil society.

ABOUT THE AUTHORS

Matt Nese *is the Vice President at People United for Privacy Foundation. He drives PUFPF's proactive and defensive legislative strategies in Congress and all 50 states and oversees the organization's policy and coalition work. Prior to joining PUFPF in January 2022, Matt spent a decade at the Institute for Free Speech, where he was responsible for setting and guiding the Institute's legislative, policy, and coalition-building activities. Throughout his 16-year career, Matt has identified and analyzed hundreds of proposals that impact political speech and privacy in association, shepherded dozens of bills from introduction to enactment, and educated policymakers and national and state-based nonprofits about their implications. His work in this area has earned him a reputation as a nationwide expert on legislative activity pertaining to free speech and association.*



Alex Baiocco *is the Director of Government Affairs at People United for Privacy Foundation. In this role, Alex develops and executes the organization's legislative priorities at the state and federal level and works with coalition partners across the country to achieve shared policy goals. Prior to joining the PUFPF team in November 2023, Alex spent seven years at the Institute for Free Speech as a Policy Analyst. In that time, he provided expertise to lawmakers, partner organizations, the media, and the public on legislation and policy proposals affecting political speech and association rights.*

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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