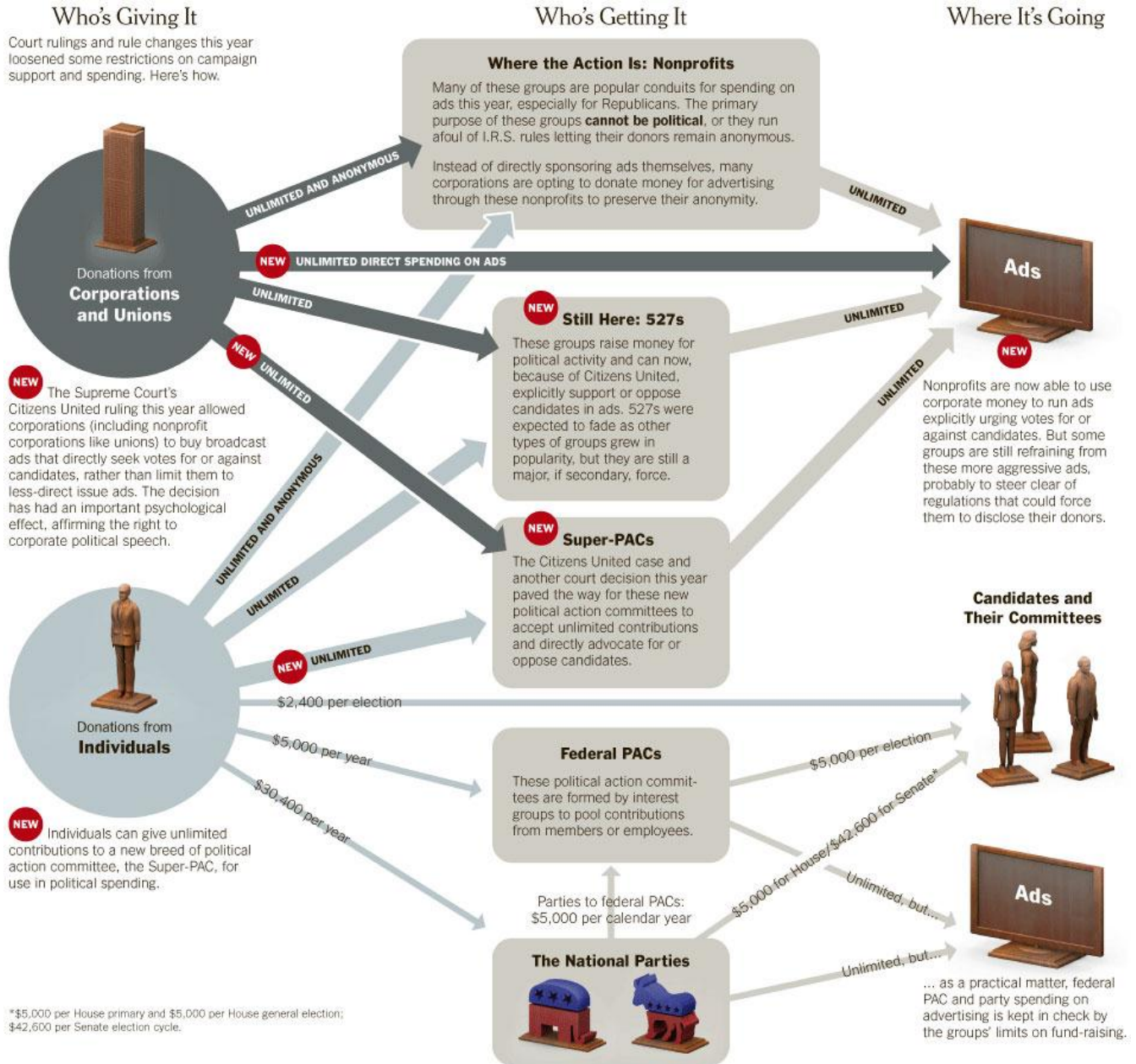


TRACKING CAMPAIGN MONEY: A GUIDE



In January 2010 the U.S. Supreme Court held in *Citizens United v. Federal Election Commission* that government **may not prohibit** unions and corporations from making independent expenditures for political purposes. Two months later, in *Speechnow.org v. FEC*, the Federal Court of Appeals for the D.C. Circuit held that contributions to groups that only make independent expenditures could not be limited in the size and source of contributions to the group.