



Research Paper

Foreign donations after Citizens United v. FEC and its effects on Sovereignty.

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I. Introduction:

According to Gallup polls and Washington: Center for American Progress, public trust in the government and government institutions has reached an all-time low(1). The American people are highly distrustful of the government system that they believe has been corrupted, delegitimized, and dominated by wealthy corporations, special interests, and powerful actors (2). After the United States, the Supreme Court issued its ruling in Citizens United v. Federal Election Commission (FEC) in 2010, a flood of spending was targeted towards super political action committees (super PACs) by secretive nonprofit groups and powerful state and non-state actors, emphasizing their power in the political landscape across the United States (3).

According to the Supreme Court precedents and current United States federal election laws, it is still unequivocal: it is unlawful for foreign companies, foreign entities, state or non-state actors to explicitly or implicitly donate to federal, state, or local campaigns to influence elections in the U.S. (4). In his research paper, Micheal Sozan of the Center for American Progress explained, "These laws are foundational to U.S. democracy and exist primarily because foreign entities are likely to have a policy and political interests that do not always align with America's best interests" (5).

Since 1971, the Federal Election Campaign Act has prohibited corporations from making contributions from the corporate treasuries to independent expenditures, which were commercials that advocated or attacked the candidacy of their favored lawmaker (6). The success of political campaigns is directly related to the effectiveness of these advertisements. Non-state actors and organizations are entirely allowed to use corporate treasury money on campaign-related advertising, according to the Citizens United decision, which opens the door to unrestricted expenditure in U.S. elections.

However, the 5-4 Supreme Court ruling of Citizens United in 2010 created an unanticipated loophole that made the American elections more vulnerable to foreign intervention by allies and adversaries alike. The United States is a capitalistic economy with free-market that has foreign investors from around the world. So currently, a staggering 35% of the U.S. stock is owned by foreign nationals (7) that serve on boards of influential corporations like Amazon, Uber, American Pacific International Capital, American Petroleum Institute, and other significant trade associations, for-profit and nonprofit organizations, giving them unambiguous power over the spending of unlimited money in the U.S. elections through super PACs from their respective entities.

Corporate and Union America has reaped the benefits of its new freedom since the Supreme Court's judgment in Citizens United. In order to elect their lawmakers that will favor their political agenda, powerful non-state actors, NGO's and big business have reportedly poured in billions of dollars (8), most of it via hidden "dark money" methods, frequently secretly funding attack ads and misrepresenting topics that are important to everyday citizens. Dark money, which cannot be traced back to its original donor, has been a big problem since the decision. Former FEC commissioner Karl Sandstrom explained, "Prior to Citizens United, all federal election money could be traced back to an individual who expanded it or contributed to political action committees (PACs)" (9).

In this essay, I will explore the question, "**To what extent did the Supreme Court case Citizens United v. FEC paves the way for foreign donations in U.S. elections and its effects on American sovereignty?**" To examine it, I will analyze the instances before Citizens United, which include foreign electoral intervention attempt by the United Kingdom in 1940, and compare its impact on U.S. elections after analyzing the instances post Citizens United which includes foreign donations through dark money by American Pacific International Capital, American Petroleum Institute, and briefly overview other national, regional, and high-profile local instances where nonprofit organizations, powerful non-state actors, and American or multinational corporations with international stockholders, and board members used super PACs to donate and elect their favored candidates and influence legislation. To evaluate the question, I used primary sources such as speeches, interviews, and discussions by scholarly professors, lawmakers, former justices, and presidents. I also used secondary sources such as research papers, newspaper and internet articles, investigative reports, and books. I have tried to use sources from the majority and dissenting opinions, as it is crucial to have an unbiased evaluation. The conclusion I will draw for this essay is how post-Citizens United, U.S. elections are more open to foreign intervention through foreign donations by powerful state and non-state actors and how they advance their self-interests while constantly trying to delegitimize and question the legitimacy of elections in the first modern democracy.

Instances before Citizens United: United Kingdom

Like much of the U.S.'s laws and principles, the prohibition on foreign interference in the elections goes back to the republic's founding and can be dated back to its earliest convention days. Article I, Section 9, Clause 8: The Foreign Emoluments Clause of the United States Constitution prohibits foreign payments to government officials and, therefore, decreases foreign governments' possibilities to influence the elected officials (10). And since then, elected officials throughout history have followed these core foundational values and passed several laws like the Federal Corrupt Practices Act in 1910, the Federal Election Campaign Act of 1971, and the **Bipartisan Campaign Reform Act of 2002** to maintain the government's power to prohibit international actors from participating in or influencing U.S. elections.

Prior to Citizens United, attempts of foreign intervention in the American electorate system were partitioned electoral interventions and were attempted by only nation-states rather than powerful non-state actors. One of such attempts was by the United Kingdom. In the early 1940s, as the war raged throughout Europe, British Prime Minister Winston Churchill felt that Britain could only survive and endure a German invasion with substantial American assistance and that defeating the Nazis would require American military engagement. Churchill knew that the president and Congress would ultimately decide whether to send necessary armaments and food over the Atlantic, followed by troopships. To persuade the American public to vote for lawmakers who support American intervention, the British intelligence organization SIS and its officers in Washington DC and New York used undercover operations, propaganda, false news reports, and dirty tactics to attempt to influence and elect pro-intervention politicians, defeat pro-neutrality candidates, and destroy or discredit the reputations of American isolationists deemed a threat to British security(11).

Apart from interfering in elections covertly through burglaries, dirty electoral tricks, forgeries, intercepting and reading diplomatic mail, illegally bugging offices, physical surveillance, and tapping phones, BSC funded and organized pro-intervention political groups and associations of emigrants from Nazi-occupied countries to lobby Congress and the public for a robust US response to Hitler.

This first significant foreign intervention in American elections, and the narrative of the British government's efforts to influence American elections and public sentiment, was a cautionary tale about the power of propaganda, the legitimacy of elections, and covert operations' ability to alter history. Through this instance, we see that the use of foreign donations to meddle in the elections is not only a possibility but rather a precedent that was further exploited after Citizens United.

Loophole created due to Citizens United

In 2010, during Citizens United's ruling the Supreme Court's 5-4 conservative majority ruled and reasoned that businesses, unions, and NGOs are entitled to First Amendment protections because they are "associations of citizens" and thus have the same rights as people to political freedom of expression in political matters. In an ensuing judgment, *SpeechNow v. Federal Election Commission (FEC)* (12) formally heralded the beginning of the age of super PACs. Super PACs are independent expenditure-only committees that may raise an unlimited amount of money from businesses, labor unions, organizations, and individuals and then spend an

unlimited amount to advocate for or against political candidates overtly. In contrast to standard political action committees (PACs), super PACs are prohibited from making direct donations to political campaigns and are prohibited from coordinating their expenditures with those of the candidates they support(13). After SpeechNow, there has been an explosion of political organizations masquerading as non-governmental organizations under 501(c)(4), many of which refuse to identify their individual donors, including corporate contributions, while spending significant amounts of money campaigning in elections. This dark money allows for anonymous meddling through unknown actors that don't always have the best interests of citizens which could further lead to delegitimizing of elections.

Nevertheless, on the contrary, the District Court for the District of Columbia in *Bluman v. Federal Election Commission* (2011)(14), the court reaffirmed that barring foreign actors from participating in the elections is not only lawful, but it is "fundamental to the definition of the national political community(15)." Judge Brett Kavanaugh wrote the judgment, concluding that the foreign-national exclusion was part of a shared international understanding of sovereignty and concern about foreign interference in elections. The special three-judge panel also concluded that "the majority opinion in *Citizens United* is entirely consistent with a ban on foreign contributions and expenditures(16)."

However, the federal statute against foreign meddling that Justice Kavanaugh mentioned was drafted long before *Citizens United* when expenditure from powerful corporations and individuals was insignificant.

Instances after Citizens United:

a. American Pacific International Capital:

American Pacific International Capital Incorporation, a California-based investment company that invests in real estate across the United States and Asia, is mainly owned by a Chinese couple Gordon Tang and Huaidan Chen. The company is known for having notorious political ties to prominent American officials and ambassadors, including President Obama's ambassador to China from 2011 to 2014 and former secretary of commerce Gary Locke to Neil Bush, the younger brother of 43rd President George W Bush and former Florida Governor Jeb Bush(17).

Based on a memo(18) obtained by 'The Intercept' and an independent investigation, it showed that American Pacific International Capital Inc.(APIC) made a significant contribution of 1.3 million \$ to Jeb Bush's 2016 presidential Super PAC Right to Rise USA' (19). Neil Bush, a board member on AIPC, helped donate the money after getting detailed guidance from Charlie Spies, the most influential GOP's campaign finance attorney. APIC's \$1.3 million contributions to Bush's 2016 Super PAC were one of the most enormous contributions made to Bush's 2016 campaign.

As with any issue, there are two sides to this story; the first is one shared by Supreme Court Justice Samuel Alito, and the former chairman of the Federal Election Commission and a prominent intellectual architect of deregulation of campaign financing, Bradley Smith, believing that that 'Citizens United' would not open floodgates to foreign money in the U.S. elections.

On the other side of the issue were noted President of the nonprofit advocacy group Public Citizen, Robert Weissman, Former President Barack Obama, Paul Ryan, deputy director of the campaign finance watchdog group Campaign Legal Center and Supreme Court Justice John Paul Stevens skeptical of the new precedent set by the Supreme Court.

President Barack Obama, during his first official State of the Union address in 2010, while delivering an alarming warning about the possible consequences of *Citizens United* where predicted that the ruling of the case would create a path for special interest groups and foreign entities to reign in hundreds of millions of dollars to influence the American electorate (20).

During an interview, Wilson Chen, the President of APIC in 2015, defended and likened APIC's political contributions to the Chinese custom of gong cha, or paying homage to the emperor, and said that APIC's political donations were similar to paying tribute to the emperor. APIC stressed many times that the business "did not intend to do anything unlawful" and that the contributions were made under the supervision of both the Spies memo and the company's counsel.

Nevertheless, that memorandum is an "explicit how-to guide for foreign nationals" who want to pour money into U.S. politics through companies based in the United States, according to Paul Ryan, deputy director of the campaign finance watchdog group Campaign Legal Center. Spies stated that the memo had been prepared during the investigation: "to guarantee compliance with the law." Nonetheless, he refused to provide any more information on the events that led to its drafting or about APIC itself.

Following an extensive investigation by the Federal Election Commission in 2019, APIC was fined \$550,000 for making the unlawful donation, and Right to Rise, a super political action committee spending millions over months financing Jeb Bush, was fined \$390,000 for accepting contributions from foreign nationals(21).

The American Pacific International Corporation's history encapsulates the strange realities of the American political system: Republican Bush Jr. and Sr. appointed three of the majority's five members in the Supreme Court's Citizens United decision. These judges created a loophole that allowed foreign money to flow into U.S. elections, which was then used to obtain foreign financing in an effort to elect a third Bush the President of the United States.

While in the 2016 presidential election, Hillary Clinton pledged to introduce a constitutional amendment to repeal Citizens United within her first 30 days in office if elected President (22), and while the Democratic Party has decried the Supreme Court's decision in its election-year campaign rhetoric over and over again; it has been the party that secured \$514 million in dark money through the same loophole during the 2020 presidential election year.

b. American Petroleum Institute:

One of Washington's most prominent trade organizations, the American Petroleum Institute, has over 400 corporate members, including American titans such as ConocoPhillips and Exxon Mobil (23). However, according to API state business records and two former API employees, the trade association's board of directors includes a minuscule number of oil and gas industry CEOs who oversee the trade association's primary political efforts (24). According to the DOJ records, one of the rings is an unusual bell: Tofiq Al-Gabsani, a registered Saudi Arabian lobbyist (25). He is the President and chief executive officer of Saudi Refining Inc., a fully owned Saudi Arabian Oil Company subsidiary, or Aramco (26).

As a result of Citizens United, API and other trade organizations use the American flag to conceal international and even foreign corporate political expenditures. API is no longer required to officially separate its company funds while attempting to influence elections, enabling corporations like Saudi Aramco to pour money into campaign advertisements without being detected. Saudi lobbyist Al-Gabsani is prohibited from heading a political action group under federal law as a foreign national. Nothing, however, precludes him from serving as the leader of a trade group that makes political expenditures in the same way a PAC does. This is an example of the use of the loophole from Citizens United, essentially allowing a foreign national to dump an infinite amount of funds into empowering political campaigns.

Prior to 2010, API fought the Obama administration over climate change(27). Even piecemeal legislative solutions like the Waxman-Markey bill(28) to cap carbon emissions would cause economic devastation, it said, hiring K Street lobbyists and funding bogus research. During the bill's discussion, the trade organization spent over \$7.3 million on federal lobbying (29).

API and similarly structured trade organizations helped produce one of the most historical midterm election shocks. Democrats lost 63 seats in the House of Representatives and control over twenty chambers across the fifty states due to the negative advertising campaign(30). However, as the 2010 midterms approached, API and other trade organizations had more firepower than they could have imagined due to the non-disclosure and unlimited campaign expenditure resulting from Citizens United. External expenditure organizations surpassed party spending. This is especially problematic as it emphasizes the ability of foreign donations to swing elections, the fact that the lobbying may have been illegal holding the potential to de-legitimize the elections. In the wake of the Democrats' demise and the GOP's takeover of the House, the President had to renounce most of his domestic programs.

The Democrats' defeat in that election year severely hampered their ability to combat global change. Eighty-six percent of new freshman tea party members signed a pledge sponsored by the oil industry, pledging to oppose any climate-related legislation (31). The moment John Boehner seized the reins of the House of Representatives, all chance of passing climate legislation was dashed. By losing the Democratic Party, the oil companies represented by API and Saudi Arabia, which is the world's largest crude exporter, benefitted from the election's outcome. API spent millions of dollars on ads presenting oil company prerogatives as patriotic responsibilities, mimicking the Republican call for more domestic drilling in order to achieve "energy independence" for the United States, which API opposed. After funding tea party victories in the 2010 midterm elections, the American Petroleum Institute (API) concentrated on pushing the government to promote the Keystone XL pipeline project and preserve billions in tax breaks granted to foreign and domestic oil companies (32).

Saudi Arabia has spent years blocking international attempts to combat climate change. Mohammad Al-Sabban, a senior adviser to the Saudi government on energy policy, helped lead the opposition to a global climate accord in Copenhagen just weeks before President Barack Obama's 2010 State of the Union address, in which he warned of the dangers of foreign corporate money in politics (33). Al-Sabban, like many of the fossil-fuel-dependent interest groups, has even questioned the idea that the industrial sector is a contributing factor to climate change. In an interview with BBC News, he said that climate change has been occurring naturally for thousands of years and not as a result of human activities (34).

c. A brief overview of other instances:

Existing federal laws have been allegedly broken in order to actively influence U.S. elections by utilizing LLCs, other business formations, and straw persons.

Meddling in the local election:

Mexican billionaire Jose Susumo Mastura with the help of a U.S.-based political consultant, donated approximately \$600,000 to help elect high-profile candidates, including former mayor and council members in San Diego, California, during the 2012 elections. Mastura donated to elect lawmakers to back his political ambitions to promote his development goals and real estate enterprises. He did so through straw donors and shell companies. A straw donor is an individual who makes an unlawful contribution by utilizing another individual's money (35). Neither of the candidates he contributed to was aware of this unlawful conduct. Jose Mastura was prosecuted in 2017 by the Southern District of California for illegal donations (36).

Meddling in the national election:

As part of a failed attempt to buy influence in government, Malaysian financier Low Taek Jho and prominent rapper Prakazrel "Pras" Michel were charged by the Justice Department in May 2019 with illegally funneling foreign campaign contributions into President Obama's 2012 reelection campaign and a pro-Obama super PAC in a failed attempt to buy influence in government (37). They are suspected of conspiring to cheat the United States government by moving more than \$21 million in foreign funds and funneling a portion of it into the election, according to an investigation launched by the FBI. Specifically, the indictment alleges that Michel paid approximately \$865,000 to 20 straw donors(38) in exchange for them making contributions to a presidential fundraising committee while concealing the trustworthy source of the funds and that he funneled more than \$1 million to a separate, independent spending committee. According to the New York Times, Low has been connected to alleged illicit money transfers to President Trump's joint fundraising committee. Notably, in 2016, Republican-led Federal Election Commission commissioners blocked an effort by their Democratic counterparts to start an investigation.

According to a complaint filed with the Federal Election Commission by the nonpartisan, nonprofit Campaign Legal Center in 2019, Berry Zekelman, chairman and CEO of Zekelman Industries and an American citizen, engaged in political campaigning while in Canada. Zekelman and his company, Wheatland Tube LLC, made at least \$1.75 million in contributions to a super PAC that supported Donald Trump's presidential campaign. He allegedly told Wheatland Tube authorities that he wanted to find a method to contribute to the super PAC that supports President Trump. Zekelman went on to lobby the Trump Government and the

administration on steel-industry-friendly legislation, and he was successful (39). Despite Zekelman's denial of any wrongdoing, he violated a law prohibiting foreign investors from engaging in a corporation's decision-making regarding election-related contributions by making them himself and for which he wasn't charged(40).

II. Conclusion

In relation to sovereignty and the integrity of American elections, it should focus on changing laws that close the loophole to foreign donations. As we have seen through various examples of straw persons, Super PACs, and other ways powerful non-state actors and corporations have tried to influence the outcome of the U.S elections.

One of the main limitations I encountered was looking for reliable sources about foreign intervention by non-state actors through private donations to influence the outcome of the elections. While there were very few instances of individuals trying to influence the elections they were either in the early 20th century or were too insignificant and from unreliable sources.

A question that remains unanswered is the number and exact amount of donations by state and non-state actors through super PACs? One of the biggest loopholes about Super PACs is they don't have to disclose the individual donor contributions. While election experts say it's hard to correctly measure the degree of foreign money in U.S. elections, they all agree that it's expanded significantly since the landmark Supreme Court decision.

The democracy of the United States is under danger from both foreign organizations seeking to influence the outcome of our elections and from a previous president who publicly welcomed foreign involvement in the electoral process. To safeguard American democracy, Congress may take a simple, common-sense step by enacting legislation that establishes explicit foreign-ownership thresholds, which would prohibit election expenditure by foreign-influenced companies in the United States. Management of a United States company that wants to spend money on election-related activities must refrain from being influenced by foreign investors to whom they are responsible for their actions. America's founders made it plain that democracy's success depends on the fundamental premise that the elected officials must answer solely to the American people. While there is overwhelming evidence that foreign donations in U.S elections have increased since Citizens United; the extent to which they have impacted elections is very subjective and dependent on every election cycle.

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