

2023-2024

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Recommended MLA Citation

Kocot, Kristy. “Money That Flows in the Shadows’: *Citizens United*, Dark Money, and the Need for Rhetorical Competence.” *James Madison Undergraduate Research Journal*, vol. 11, no. 4, 2024, pp. 38-48. <http://commons.lib.jmu.edu/jmurj/vol11/iss1/4/>

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“Money That Flows in the Shadows”

Citizens United, Dark Money, and the
Need for Rhetorical Competence

Kristy Kocot

Abstract

The 2010 United States Supreme Court decision, *Citizens United v. FEC*, has the potential to present a significant threat to American democracy. The landmark decision removed limits on corporate contributions, allowing disproportionate dark money influence from corporations in American political campaigns. This paper explores the ethical dilemmas of the *Citizens United* decision, drawing from peer-reviewed scholarly journals, legal documents, and advocacy organizations to highlight the negative impact that dark money has on American politics. *Citizens United* and its aftermath demonstrate the necessity for rhetorical competence in a democracy with broad protections for individual and corporate speech. The paper argues that citizens can counter the disproportionate influence of dark money by enhancing their rhetorical competence and media literacy skills to effectively recognize and navigate the influence of undisclosed, untraceable funds in the American political system.

Introduction

The United States is a representative democracy: the government is elected by the people and for the people to enact legislation and policy decisions on behalf of citizens' interests (Day). Unfortunately, the American system does not always deliver on these democratic principles. The United States Supreme Court's 2010 *Citizens United v. Federal Election Commission* 558 U.S. 310 decision removed limits on corporate contributions and allowed disproportionate influence by corporations on proposed legislation and policy decisions. In the years since *Citizens United*, this influence has been made worse by the effects of dark money, the unlimited and untraceable corporate spending in issue advocacy, which is associated with political campaigns and advocacy campaigns (McLure). The flood of uncontrolled money from undisclosed sources undermines the integrity of democratic institutions by allowing corporations to buy the hearts and minds of voters, advance unknown corporate and political interests, and silence social causes.

Although the phrase "dark money" frequently appears in the news, many voters do not recognize its significant impact on their own political decisions, which can determine the success or failure of political candidates and initiatives in the United States. When the issue of "dark money" is presented in a situational context, the media assumes that the public understands dark money and the ethical considerations involved with influence-buying. However, the average American voter knows little about campaign finance or who is behind the money. Daron Shaw, Brian E. Roberts, and Mijeong Baek, authors of the 2021 book *The Appearance of Corruption: Testing the Supreme Court's Assumptions about Campaign Finance Reform*, found that "only 27 percent of people said they were familiar with the term 'dark money,' whereas 73 percent admitted that they did not know what the term meant" (35). Without transparency from both donating corporations and political candidates, citizens cannot possibly be aware of the influence of dark money or the importance of strategies that protect against the influence of undisclosed funds in politics.

This paper surveys the *Citizens United* decision and the ethical concerns it has raised using peer-reviewed scholarly research, court cases, newspaper reports, and nonprofit public policy documents to bring awareness to the negative influence of dark

money in American politics. Specifically, this paper argues for individual citizen's rhetorical competence in a democracy that affords increasingly broad protections to corporate speech funded by dark money. The ability to effectively recognize and evaluate the political advertisements and media produced by dark money groups is imperative to preserving a democracy based upon the well-informed decisions of its citizens. Rather than waiting on the government to pass legislative solutions to the issue of undisclosed, unlimited campaign funds, citizens can find immediate protections against the influence of dark money by increasing their rhetorical competence and media literacy.

Citizens United and Dark Money

The momentous *Citizens United v. FEC* Supreme Court decision in 2010 fundamentally altered how campaign contributions are used in American politics. The case was brought to the Court because *Citizens United*, a conservative political action committee (PAC), planned to promote a film that disparaged Hillary Clinton during the 2008 presidential election (*Citizens United v. FEC*). However, the Federal Election Campaign Act and its administering agency, the Federal Election Commission (FEC), prohibited funded television broadcasts about specific candidates just prior to primaries and elections. The FEC refused to allow *Citizens United* to screen and promote the film (Lau). *Citizens United* sued the FEC, claiming that it was unconstitutional that its film be subject to the FEC limitations on TV advertisements. The Supreme Court ruled 5–4 in favor of *Citizens United*, deciding that limiting independent political spending and electioneering communication infringes on the First Amendment right to free speech (*Citizens United v. FEC*). The Court's decision essentially meant "that corporations and other outside groups can spend unlimited money on elections" (Lau).

As a result of the *Citizens United v. FEC* decision, a new "super PAC" category was legally permissible. In his 2023 *CQ Researcher* report titled "Dark Money: Are U.S. Politics Unduly Influenced by Secret Donors?" managing editor and host of the podcast *Global Journalist* Jason McLure notes that while super PACs cannot make direct financial contributions to a candidate's campaign like traditional PACs, they are permitted to receive an unlimited number of contributions from businesses, unions, and nonprofit organiza-

tions. These organizations must refrain from coordinating with political parties or candidates, but they have found what McClure refers to as “a major loophole;” While super PACs must disclose their donors, donors can conceal their identities by routing their contributions through shell corporations. In a 2020 policy essay submitted to the House of Representatives Committee on the Judiciary subcommittee, Democratic Senator Sheldon Whitehouse of Rhode Island describes shell corporations as “limited liability corporations that obscure their true beneficial owners” and function as a “simple tool to hide donor identities” (United States 64). Corporations that conceal the origins of their donations are called dark money groups, and the undisclosed funds are referred to as dark money (McLure). The Supreme Court believed donor disclosure would allow for transparency between the public, corporations, and politicians, and the decision to permit unlimited spending by corporations was not intended to allow unethical impacts on the political process; however, dark money groups shield true sources of campaign funding so voters cannot determine the true source of the influence (Lau). Voters are unable to evaluate the intent or validity of political messages without the knowledge of where the money is coming from.

Dark Money Ethical Concerns

To meaningfully implement strategies that protect against dark money influence, the American public must first understand that a problem exists. By understanding the ethical issues that dark money creates, citizens can understand the impact it has on their lives and therefore be more motivated to protect themselves. Dark money has far-reaching effects, and unlimited and untraceable corporate spending on issue advocacy in the context of political campaigns raises important ethical questions. Three ethical issues associated with dark money illustrate how voters are impacted and why they should take action to protect themselves.

Buying the Minds of Voters

Political advertisements influence voters’ attitudes and election outcomes, as “the larger a candidate’s advantage in advertising compared with that of their opponent, the larger their share of a vote” (Sides et al. 715). Moreover, when citizens are less informed about candidates, the influence of advertisements on voter’s individual attitudes becomes even more

powerful (Sides et al. 715). Dark money groups can directly reach voters through their presence in campaign advertisements and social media platforms, and in more cases than not, their influence in politics is negative (McLure). McLure reports that in a study of 30,000 advertisements, researchers found that “during the 2010, 2012, and 2014 election cycles... advertisements funded by dark money groups were between 1.5 and three times as likely to be negative as those funded by groups that disclose their donors.”

There is a relationship between negative and anonymous advertising, according to public policy researcher Daniel Chand. In his 2017 article “‘Dark Money’ and ‘Dirty Politics’: Are Anonymous Ads More Negative?” Chand finds that “anonymously funded ads were significantly more likely to be opposition ads than ads by groups that disclosed their donors” (473). By hiding behind undisclosed funds, dark money groups produce advertisements that prey on their opponents’ characters, and while traditional campaign advertisements can also be negative, the presence of negative content appears to increase when donors are concealed (Chand 473). Equally as troubling, the public may be more likely to believe political ads when the funding sources and agendas behind them remain undisclosed. In their 2019 *Election Law Journal* article, Samuel Rhodes, Michael Franz, Erika Fowler, and Travis Ridout contribute to a growing body of research showing that “ads sponsored by relatively unknown groups (including but not limited to dark money groups) are more effective than ads sponsored by candidates” (175).

Even before the 2010 *Citizens United* decision, the negative influence of dark money advertisements impacted the minds of voters. *Dark Money*, a 2018 film directed and co-produced by Kimberly Reed, exposes dark money impacts in elections by focusing on John Ward’s 2008 Republican primary campaign to retain his seat in Montana’s House of Representatives. A group calling itself “Mothers Against Child Predators” opposed Ward’s campaign, posting advertisements claiming Ward admired a serial killer. The public only knew “Mothers Against Child Predators” through its positive social cover; in reality, the group did not represent a well-intentioned group of mothers, and cared about child predators only as a political cudgel (*Dark Money*). The deception nullified or negated the perceptions voters had about Ward. By the primaries,

it was too late and too financially taxing for Ward to combat the false narrative. Ward was defeated, and “Mothers Against Child Predators” disappeared with no trace of who was behind the group (*Dark Money*).

Since *Citizens United v. FEC*, dark money advertisements and media presence have continued to deceptively influence the minds of voters. A mysterious group known as the American Liberty Action PAC may have been decisive in the election loss of Carl Paladino, a candidate for New York’s 23rd Congressional District seat in 2022. Just days before the Republican primary, negative advertisements about Paladino flooded the Internet claiming he was a con artist and a past donor to Democratic party candidates. Following the primary, FEC data showed that the American Liberty Action PAC spent one million dollars on advertisements negatively impacting Paladino and positively supporting Paladino’s Republican rival, Nick Langworthy (McLure). Similarly, in the 2022 November election for Texas governor, a newly registered group named Coulda Been Worse LLC spent over six million dollars negatively targeting Republican incumbent Greg Abbott. The advertisements highlighted unfavorable incidents from Abbott’s time as governor that portrayed him in a negative light to voters (Svitek).

While *Citizens United* allows dark money influence to occur in the states, it also opens doors for foreign dark money groups to sway elections. External influence was documented extensively throughout the 2016 presidential election when a multifaceted attack on the United States was launched by a group in Russia. In a 2018 article for the Brennan Center for Justice, a New York-based nonpartisan law and policy institute, Ian Vanderwalker and Lawrence Norden suggest that the intent of this Russian group was to target the minds of U.S. voters, as “[t]heir scheme relied on internet ads to fuel divisive controversies, drive attendance at rallies held in the U.S., and attempt to influence the outcome of the presidential election.”

In each of these instances, dark money allowed those behind the negative advertisements to avoid accountability for the influence they had on election results. And, as McClure observes, “since dark money groups are nominally independent of the candidates they support, those candidates often avoid blowback for such ads by saying the ads were not funded by

their campaign.” According to Senator Whitehouse, the influence of dark money media is real, and voters have minimal power to recognize this type of advocacy when they lack knowledge of who the political forces are and on whose behalf they are attempting to influence (United States 80).

Advancing Unknown Corporate and Political Interests

Unlimited anonymous spending is not transparent to the general public, and it can be similarly opaque to the shareholders of corporations, since investors do not have the direct authority to control corporate spending (“How ‘Dark Money’”). As University of Pennsylvania Law School professor Jill E. Fisch notes in a 2016 *Knowledge at Wharton* podcast episode titled “How ‘Dark Money’ Distorts the Political Process,” “technically, it is really the corporation’s money, not the investors’ money, and part of buying stock in a corporation means you delegate to the executives decisions about how to spend that money.” While executives are expected to spend that money in the corporation’s best interest, lack of transparency can allow executives to spend money to advance their own political agenda, which may not always be in the best interest of the corporation or investors (“How ‘Dark Money’”). Executives with control of corporate spending may have discretion to spend up to a certain limit without disclosing the use of those corporate dollars. According to Boston College law professor Kent Greenfield, without disclosure rules—and thus without risking stakeholder interest and support—executives can use corporate funds to support individual interests or issues that may not be consistent with the values of the corporation (156). In 2020, *New York Times* DealBook columnist Andrew Ross Sorkin surveyed the Center for Public Accountability’s work to analyze corporate political donations, observing that dozens of Fortune 500 companies and other corporations discreetly supported political causes that conflicted with their public positions over the last decade. Without disclosure requirements, corporations can continue to donate to causes in opposition to those the corporations publicly support.

In the same way that nondisclosure allows corporations to act inconsistently with their public positions, nondisclosure allows candidates to quietly benefit from dark money interests that they can publicly disavow. Candidates who oppose dark money still need

financial support for their campaigns, and those who align with the views of wealthy corporations will have greater resources and therefore greater chances of winning an election. This creates public uncertainty as to whether candidates support issues antithetical to the beliefs they profess to their supporters. For example, President Joe Biden has actively encouraged legislation that would require super PACs to disclose their donors. In a 2022 White House speech, Biden came out strongly against dark money: "There's...too much money that flows in the shadows to influence our elections... Too often, powerful special interests use front groups to run these ads to win at any cost... Ultimately, this comes down to public trust. Dark money erodes public trust. We need to protect public trust. And I'm determined to do that." Despite his public opposition to dark money, Biden has benefited from undisclosed funding since his presidential campaign. After he won the election in 2020, "Biden's allies formed a dark money group called Building Back Together to promote his policies during his presidency" raising over \$40 million in 2021 (McLure).

At the Expense of Social Causes

As dark money groups enable candidates and donors to conduct business behind closed doors without any accountability candidates may feel towards their supporters, they often function as barriers to important social causes. For instance, by spreading false information about climate science and clean energy and funding candidates who support fossil fuels, some dark money organizations actively work against initiatives that protect the environment (Tigue). In January of 2023, Mike DeWine, the Republican governor of Ohio, signed legislation that used the term "green energy" in reference to natural gas, despite the fact that natural gas emits large sums of greenhouse gasses. Later in January, *Washington Post* writer Maxine Joselow and researcher Veronica Montalbano reported in "How Dark Money Groups Led Ohio to Redefine Gas as 'Green Energy'" that dark money groups such as the Empowerment Alliance and the American Legislative Exchange Council had helped publicize the belief that natural gas is environmentally friendly to encourage the public to support and defend the state's harmful energy industry. In situations like these, corporations protect their interests, and dark money groups work with them by protecting their finances. In 2023, for instance, Joselow reported in "Gas Industry Is Under fire. It's Hiring Democratic Politicians to Help" that "a

nonprofit created by a half-dozen gas companies was hiring prominent Democratic politicians and pollsters for the purpose of improving the reputation of natural gas among liberal voters." Corporations may fund dark money groups to advance their economic interest, even if it means misleading the public in terms of their stated interests.

Legislative and Regulatory Solutions

In September 2022, Senator Whitehouse reintroduced the Disclose Act, a campaign reform finance bill first proposed in 2010, which would require super PACs and dark money groups to disclose any donor who contributes more than \$10,000 in an election cycle. According to Amy Wang, a *Washington Post* national politics reporter, "the Senate failed to advance the Disclose Act on a 49–49 vote along party lines." While a 2023 re-introduction of the Disclose Act, the 2023 End Dark Money Act, and the 2024 End Tax Breaks for Dark Money Act all languish in Congress ("S.512"; "All Info - H.R.142"; "H.R.7244"), public policy institutions and various reform organizations have proposed legislation for the government to consider. The Brennan Center for Justice "drafted legislation targeting false information in political ads and urged that the 'Truth in Advertising' standards that companies must abide by should also apply to electioneering, too" (Herrle). Furthermore, Senator Mark Warner of Virginia has suggested that digital media should fact-check their advertisements in the same way cable networks do, and Warner has joined Senators Amy Klobuchar of Minnesota and Lindsey Graham of South Carolina in proposing the Honest Ad Act which would require that campaign finance laws apply to online advertising (Herrle). Despite these calls for new FEC laws and regulations, no significant progress has been made at the federal level, and the issues brought about by *Citizens United* persist.

Citizens need countermeasures to protect themselves from the influence of undisclosed funds in politics. Many groups, including the Brennan Center for Justice, encourage citizens to push for tighter FEC rules and regulations and show support for movements that encourage campaign finance reform (Lau). While there is value in recognizing that constituents can press their federal representatives to support legislation mitigating the impacts of dark money, these

solutions often feel out of reach, vague, and unrealistic for the average citizen. Proposed solutions to dark money lack fast-acting, straightforward ways in which citizens can protect their confidence in democracy; discouragement rises, and citizens are left feeling as though their only choice is to wait for the government to make a difference.

Rhetorical Competence by, of, and for the People

Although much of dark money's influence is currently out of the public's control, there are ways citizens can take the issue into their own hands to protect themselves. By focusing on what they can control, such as their rhetorical competence, media literacy, and their role as active citizens, voters can decrease the negative influence dark money holds over their minds while making candidate judgements. *Citizens United* and its aftermath reveal rhetorical competence is a key skill in a democracy that allows corporations to have undue influence on legislation and policy decisions that promote their interests.

While this paper proposes that citizens can use their knowledge of rhetoric to decrease the power of dark money influence, it is important to note that this solution requires motivation to become rhetorically competent. Many citizens are willing to educate themselves, but some are politically apathetic, meaning they lack interest in political concerns and outcomes. Political apathy is a threat to voting outcomes and a threat to America's democracy (Vorkapić et al. 579). While political scientists continue to search for solutions to combat the lack of civic engagement among Americans, research has revealed that "the greater the level of political awareness, the less is the intention for political apathy" (Vorkapić et al. 587). Political apathy breeds voter carelessness, and citizens cannot afford carelessness amid the growing threats to American democracy since *Citizens United*.

Increasing Rhetorical Competence

Rhetoric is "the art of speaking or writing effectively" ("Rhetoric"), and at its foundation is the idea that words matter (Blankenship and Jory). Increasing rhetorical competence allows people to avoid becoming victims of dark money groups' use of rhetoric to deceive and sway public opinion. As Timothy Borchers and Heather Hundley write in *Rhetorical Theory: An*

Introduction, Second Edition, rhetoric is "the use of language and other symbolic systems to make sense of our experiences, construct our personal and collective identities, produce meaning, and prompt action in the world" (24). Rhetoric is unavoidable, and people are influenced by it repeatedly whether they realize it or not.

Although rhetoric has the power to positively impact society, it also has the power to manipulate audiences. Marcela Andoková and Silivia Vertanová, professors at the Comenius University Bratislava, note that unless they analyze language, people become influenced by persuasive speech regardless of its validity or intent (135). As mass media continues to globalize, enhancing rhetorical competence is more relevant than ever because "today's society is exposed to strong pressures on the part of mass media which do not presuppose either a real or fictitious dialogue with their recipients as it was the case of a good orator in ancient times" (Andoková and Vertanová 142). In the context of decreasing dark money influence, questioning and understanding rhetoric and its sources is the most straightforward approach one can employ to protect against manipulation of public opinion.

Rhetorical devices play a large role in defining invalid, unreliable information in campaign advertisements and political media content (Beisecker et al.). It is important to understand that dark money groups do not represent the public's best interest and that they actively use rhetorical concepts such as audience, purpose, and context to target specific groups of citizens in their messages. For instance, effective communicators carefully craft their messages for their target audience's knowledge and positions on issues (Blankenship and Jory). Following the rhetorical concept of audience, communicators also have a purpose for each message they create. As audience members, citizens should consider the intent behind a political message and the goals the communicator had when producing their text (Blankenship and Jory). Taking a rhetorical approach to evaluating communication allows individuals to see that one's own language is being used with intent to accomplish a distinct goal (Dsouza et al. 25). Considering what the communicator is trying to make them believe will better allow citizens to recognize the ways they might be misled.

Lastly, communicators think rhetorically about con-

text to take into account the potential limitations of their messages and help predict their audience's response (Blankenship and Jory). When examining political messages through the lens of rhetoric, citizens can be reminded to question audience, purpose, and context to seek the truth in political messages. Ultimately, rhetoric is a valuable tool for evaluation, and understanding the ways in which dark money groups employ rhetorical concepts allows the public to consume political advertisements and media in a more critical and analytical way. Becoming rhetorically competent is necessary in a democracy, and the negative impacts of dark money reiterate why this skill is crucial.

Improving Media Literacy

One can enhance their media literacy with higher levels of rhetorical competence to effectively control how they interpret and interact with campaign advertisements as well as political media content. A 2018 study by Stanford researchers Sarah McGrew, Joel Breakstone, Teresa Ortega, Mark Smith, and Sam Wineburg evaluated students' effectiveness in judging online sources. The researchers suggest a strategy called civic online reasoning, which "encompasses the ability to effectively search for, evaluate, and verify social and political information online" (McGrew et al. 168). To employ this strategy, there are three questions one should ask: "Who is behind the information? What is the evidence? What do other sources say?" (McGrew et al. 168). As reliance on the internet increases, having effective skills to navigate political information online is vital to America's democracy.

As citizens evaluate who is behind a message, they should do research to determine the credibility of the person or group who produced the political advertisement or media post. They can do this by researching the individual or reading an 'about' page on an individual's website, but it is important to remember that the 'about' page is produced by the same person who created the content being assessed. Therefore, "if the website is untrustworthy, then what the site says about itself is most likely untrustworthy" (Breakstone et al. 982). Another useful tool when assessing who is behind a message is looking at their motives (McGrew et al. 174). Researching an individual's political stance, support for certain groups, or commercial interests could help in determining their intent since these aspects reveal potential bias.

When assessing the evidence within a message, citizens should consider the sources used, the claims made, and whether or not the evidence truly supports the purpose of the message (McGrew et al. 168). Deceptive rhetorical devices that are employed by dark money groups in their media are often fallacies, and by evaluating the congruence between the evidence and claims, individuals can better determine the validity of a message. Fallacies are often difficult to recognize, as they "use true information in a reliable context; but exaggerate or modify certain elements that distract from the factual level" (Beisecker et al.). They are purposefully employed to mislead; however, when claims or conclusions are specious or fallacious, the evidence usually does not perfectly align with the claim. By carefully evaluating the evidence alongside the overall conclusion, one can better detect any errors in the message's logic and reveal the soundness of the source.

Citizens should also survey multiple alternative sources to ensure that the claim builds on or parallels existing information. A 2022 Stanford study on how college students and fact-checkers evaluate online sources about social and political issues revealed that lateral reading, or "the act of leaving a webpage to search for information about it from credible, independent sources," was a principal approach to navigating the accuracy of online messages (Breakstone et al. 966). Furthermore, citizens should consider the algorithms of search engines when checking information across a variety of sources. Though platforms claim to be neutral, "digital media is not as open and democratic as it is often assumed, and social media algorithms participate actively in promoting certain media content" (Dillet 243). Platforms are intentional about their placement of certain messages within algorithms, so it is important to understand that the first result is not always the most reliable source. Algorithm awareness is necessary when navigating digital media, as political content posted by advertisers is consistently altered to influence the views of platform users (Dillet 243).

Employing civic online reasoning allows citizens to decrease the impact of negative dark money messages that intend to sway their votes. By determining who is behind a message, assessing the evidence within a message, and comparing the information to other sources, citizens have a better understanding

of the accuracy of the message and are able to make better informed civic decisions (McGrew et al. 185).

Encouraging Rhetoric and Media Literacy Studies in Education

Though pushing for change at the federal or state level may seem out of reach for the average citizen, encouraging advancements to combat dark money influence at the local level may be more realistic. One of the simplest ways voters can do this is by advocating for media literacy programs in their community's local school system. Research conducted on high school students reveals that "students in a selective-admission media literacy program have substantially higher levels of media knowledge and news and advertising analysis skills than other students" (Martens and Hobbs 120). According to California-based high school English teacher Jori Krulder, media literacy programs can be implemented throughout K-12 education to provide students with the tools to become "more conscious consumers" (qtd. in Barack). It is important that citizens have the appropriate foundation to process information in a meaningful way, and educational programs on rhetorical competence and media literacy would ensure they can process information effectively. As rhetoric-focused education provides the public with strategies to identify manipulation, it should be fundamental in all areas of study (Andoková and Vertanová 142).

Conclusion

Ultimately, a democracy is no longer secure when an entity such as a corporation, rather than an individual, becomes the dominant voice with limitless, untraceable spending to influence the public. The problem with the *Citizens United* outcome was not its acknowledgement that corporations have a role in the political environment, but its lack of recognition for how the undisclosed and unlimited presence of a corporation's money skews the views of the public and has the capacity and resources to distort the democratic election process. Without serious, concerted attention, dark money will continue to influence America's election cycle.

Current and future voters must educate themselves about *Citizens United* and the potential for dark money groups to harm democracy by taking control of the economy, lawmakers, and media. After recognizing corporate influence and the power of money in pub-

lic policy, citizens can push for tighter FEC disclosure regulations and fight for regulators to enforce such requirements. Disclosure is key: by automatically regulating corporations, imposing discipline on political contenders, and providing voters with information to make informed decisions, disclosure would effectively minimize the corruption present in the political system, making for a more fair and ethical democratic election process (Potter and Morgan 388).

More immediately though, instead of waiting for the government to pass legislation or to implement regulations, citizens must independently take control by increasing their own awareness, enhancing their understandings of rhetoric, and educating themselves on media literacy skills. Although the solutions proposed by this paper work at the individual level, the problems associated with undisclosed funds in politics are substantial, and major solutions begin with even small amounts of improvement. Overall, society must understand that limitless spending on public advocacy financed by undisclosed donors makes for a country no longer governed by people who are free but rather a country governed by the money that controls the message.



Author's Note

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Kristy Kocot ('23) graduated *summa cum laude* with a bachelor's degree in Writing, Rhetoric and Technical Communication. Kristy now works for the federal government. The views and opinions in

this paper are not views and opinions of the federal government but of the author's own, and the information contained in this paper is not endorsed by any federal entity.

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