How Money is Painting Your Life: An art-based lesson on money and politics and corporate personhood Facilitator's Guide

Educational Objective: This curriculum offers activists, organizers, and everyday people a way to think about and frame the conversation surrounding a 28th constitutional amendment to overturn *Citizens United, Buckley v. Valeo,* and similar cases. Centering a piece of art created by Michael Conroy (art below), this curriculum will work around the art and give substantive background on the history and case law that lead us to the political system we have today. It will also discuss policy implications of *Citizens United*, and how this harms everyday people, especially people who already experience other systems of oppression (including people of color, poor people, and LGBTQ people). This curriculum has been used at events in Roxbury and New Bedford, MA. We strongly encourage facilitators to watch the <u>video</u> of the Roxbury event to understand how to present this material.

Examples and discussion should be adapted to fit what is best for your community. For example, when discussing the policy implications, please bring in local examples! Discuss how big money made it difficult to advocate for certain laws or protections. Talk about what companies profit from laws that hurt your community, and see if those companies donate to local politicians who enact those laws. Always look for ways to make this conversation personal and relatable.



Introductions

- <u>Introduce Yourself</u> (name and pronouns) <u>+ Your Organization</u> (mission statement and what you do within the organization)
 - This curriculum comes from Free Speech For People and American Promise
 - Free Speech For People (FSFP) is a non-partisan, non-profit organization working to renew our democracy and our United States Constitution for we the people, not big money and corporate interests. We work on passing a Constitutional amendment to overturn *Citizens United* and similar court cases, and use legal advocacy to confront misuse of the Constitution by wealthy and corporate interests.
 - American Promise (AP) is a cross-partisan organization dedicated to overturning Citizens United by passing a 28th Amendment. Through a 50-state uprising, the American Promise strategy is focused on having a distributed, decentralized support model, building national consensus, and holding elected officials accountable.
- <u>Introduce the Artist Michael Conroy</u> (if present) introduce himself (name, pronouns), where we can find you, locations for other art / upcoming events, why did you make this piece
- <u>Why are we here</u>: This event uses Michael Conroy's art to facilitate a conversation on money in politics and corporate personhood. ["Our organization thought this was important to discuss money in politics and corporate personhood with community because XYZ" here you should discuss why you think money in politics is important to address]. This information can be a bit dense, so feel free to take notes, ask questions, and know that we will send an email of this lesson plan to everyone here. If you want to go back and review any portion of this lesson plan, a similar session that took place in Boston was filmed. We want this to be an informal space that encourages communication between [the presenters], [Michael if applicable,] and the crowd, so feel free to raise your hand and ask questions at any point. [At the end, there will be an artist talk-back, where folks can ask Michael any questions about his art! see if Michael is willing to come speak to the group. His email address is INSERT]

Ask the participants what they notice first about the piece of art

- Just to get us used to <u>talking about art</u>, I'm going to have us get into a routine. Let's talk about: what do you see, what do you think, what do you wonder.
 - Let's start with what do you see: I see the words Buckley v. Valeo

- What do you think: I think the artist must make a connection with Buckley v. Valeo and "freedom of speach"¹ because of the arrow
- What do you wonder: I wonder what Buckley v. Valeo is about

We're going to work our way around the piece of art to address some of the main points regarding money in politics and corporate rights, starting with Buckley v. Valeo.

Buckley v. Valeo (1976)

Facts: After the Watergate scandal in the 1970s, bipartisan campaign finance limits were passed in Congress. Campaign spending limits could (1) promote political equality – the idea that everyone has a say in politics, and (2) avoid corruption or the appearance of corruption. Wealthy donors sued, saying that their 1st Amendment rights to freedom of speech were being violated. Before we go any further, I want to check in to see if folks here know some of the terms we will be using. It's perfectly ok if you do not know any of the terms!

<u>Check in for terms</u> [this information is dense - assume people have no background. Ask the participants if they know any of these terms; if people do know the terms have them answer. Make this part as interactive as you can. You can encourage people to answer by doing things like providing candy or treats for people who answer correctly, or by making a fast and short game related to learning terms.]

- Expenditure candidate spending advocating for the election or defeat of a candidate
- <u>Independent expenditures</u> outside spending that advocates for a politician without working in "coordination" with that politician,
 - "Coordination" between candidates and outside spenders can be hard to prove unless there is explicit but private communication between the two sides. This gives a lot of loopholes to exploit.
 - <u>Ex of what is considered "independent</u>": Senator Thom Tillis (R-NC), running for election, posted on his website a memo which outlined his campaign's detailed advertising strategy. The Democratic Congressional Campaign Committee did something similar for a congressional race in New York.
- Contribution giving money directly to a politician
- PAC ("political action committee") a committee that collects contributions from different people and then uses them to make political contributions to candidates, or in some cases expenditures
- Super PAC political action committee that only makes independent expenditures
- <u>Political Equality</u> the idea that everyone should have an equal say who represents us and who gets elected

¹ "Speach" is spelled incorrectly because the artist was highlighting the hypocrisy of corporations having "free speech" but never being able to "speak."

• Corporation - distinct legal entity, legally separate from the people who invest in it or work for it; corporations created by state governments and come in a few different forms, including for-profit and non-profit.

[At the Roxbury event, Jasmine Gomez from FSFP used a flow chart to explain the holding of *Buckley v. Valeo*, and continued using that visual display to indicate how *Citizens United* expanded from the *Buckley* holding. You don't have to make a flowchart, but please make the discussion on caselaw interactive to help people remember the holding]

Decision said (1) limitations on independent expenditures (advocating directly for a politician without working in coordination with that politician), limitations on expenditures by candidates from their own personal or family resources, and the limitation on total campaign expenditures, each have the same Constitutional protections as engaging in free speech, and therefore rich people have a First Amendment right to spend unlimited amounts of money on elections, and (2) the **only** acceptable reason to regulate campaign finance is to prevent corruption or the appearance of corruption. The Court determined the government was **not** able to limit political money to promote political equality (the idea that everyone has an equal say in politics).

- [Make sure to highlight the overlay of "freedom of speach" on top of the money on the left side of the painting]
 - Supreme Court Decision (recap of main points of court case):
 - Money Can Be Speech instead of saying money is money and speech is speech, Supreme Court put speech value on political uses of money (contributions and expenditures)
 - Expenditures v. Contribution the Supreme Court said that money used to buy something (like an ad) is an "expenditure" and therefore has high speech value; "contributions" have *some* speech value, but it's more limited
 - Corruption the only reason we can limit money in politics is to prevent corruption or the appearance of corruption. But the Supreme Court did not give a precise definition of "corruption" in Buckley, and so people spent years arguing over whether corruption meant just literal bags of cash in exchange for specific votes, or whether it also included influence, access, and the like.
 - Individuals Running for Office Have No Spending Limits Buckley says that if you are running for office, you should be able to spend as much money on yourself as you want, which allows wealthy candidates to outspend those with less money
 - After *Buckley*, the general rule was that there could be local, state, and federal limits on *contributions*, but not on *expenditures*

■ For many reasons, mostly political and not legal, people did not fully exploit *Buckley* right away

[highlight how the arrow takes us from Buckley, through Boston's John Hancock Tower (made of money with an arm, leg, and head), over to the words *Citizens United*. This shows how over time, the Courts thought of corporations as people, which hit a new pinnacle with *Citizens United*.]

Citizens United (2010)

Facts: The Bipartisan Campaign Reform Act of 2002, also known as the McCain-Feingold law, prevented corporations from using their general treasury funds to run advertisements that support a candidate. Citizens United is a non-profit corporation that sued because it wanted to run a documentary giving reasons not to vote for Hillary Clinton.

Holding: The *Citizens United* decision built off *Buckley* and said that (1) corporations have the same First Amendment right to "speech" that people have, and therefore (because spending money is protected), corporations are also able to spend unlimited amounts of money on expenditures for elections (from their general treasury) and (2) the only corruption we can regulate is quid pro quo corruption (literally giving money in exchange for a vote, or basically, bribery). The Court reiterated that we have no ability to regulate to promote political equality. And, while bribery is a problem, it pales in comparison to the problems of inequality in our country—be it economic inequality, racial inequality, political inequality, and other forms of inequalities and oppression.

- This case overturned precedent going back to 1990, including a case upholding this very same limit from just seven years earlier (2003)
- Although the decision involved a nonprofit, the decision ended up applying to ALL corporations including Chevron, US subsidiaries of foreign corporations, etc

Case does 3 major things:

- ALL corporations (for-profit and non-profit) are to be treated the same as people w/regard to political spending
- **Corruption** Supreme Court says we can only regulate to prevent *quid pro quo* corruption (i.e. bribery). "Influence" and "access" -- the way that money in politics mostly works -- do not count as "corruption" after *Citizens United*. This is a big change because actual bribery is fairly rare, and if the only type of "corruption" that we're allowed to care about is quid pro quo corruption, that makes it harder to justify some limits on money in politics.
- Independent expenditures can never cause quid pro quo corruption. The *Buckley* decision had suggested that independent spending (with no coordination) was less capable of corruption, but it never went as far as to say that independent spending *cannot possibly* cause corruption. *Citizens United* took that next step, without any evidence to support it.

After Citizens United, Super PACS were created

<u>SpeechNow</u> (D.C. Circuit case, 2010) - this court case came on the heels of the *Citizens United* case. SpeechNow.org was a PAC that promised to make only "independent expenditures." It argued that since *Citizens United* said that independent expenditures can never be corrupting, then PACs which only make independent expenditures (aka "Super PACs") could never be corrupting. The court therefore struck down limits on how much could be given to Super PACs. In effect, this allows corporations and wealthy individuals to spend unlimited amounts of money in politics through the loophole of donating to a Super PAC.

Corporations didn't just start claiming corporate rights at this point. [note the 14th amendment connecting to *Citizens United*]

This was not the first time corporations went to the courts for protection.

Some context for the 14th Amendment: The United States was <u>founded on slavery</u> which was very <u>profitable for land-owning white men</u>, making a wealthy elite in our country. After many years of struggle, the Civil War was fought in large part because the Southern states wanted states' rights so they could <u>continue slavery</u>. Even after slavery was abolished, white people in positions of power still discriminated against former slaves, preventing people of color, especially Black and brown people, from having access to economic mobility. In an effort to equalize the playing field and give non-white people an opportunity to properly live in the United States, Congress passed the 14th Amendment to prevent discrimination against people of color and guarantee equal protection of the laws.

Wealthy elites saw their power becoming diluted after the freeing of slaves and passage of the 14th amendment. As a result, they looked to corporations as a new tool to hold power and finances. Since corporations were limited in scope when they were first created, wealthy elites tried to shake these limitations by claiming that corporations should be afforded the same rights as people. After the 14th amendment was ratified, corporations used the 14th amendment's non-discrimination language to try and overturn laws like worker's comp and child labor. In *Santa Clara County* (1886) the court sided with a corporation that used the 14th Amendment in its argument. The Court's opinion started with the following statement: "the court does not wish to hear argument on the question whether the provision in the 14th Amendment to the Constitution, which forbids a State to deny to any person within its jurisdiction equal protection of the laws, applies to these corporations. We are all of the opinion that it does." To this day people are unsure as to how or why this appeared at the very beginning of the court case (that is highly unusual). The *Santa Clara County* case was then used during the 1920's to develop the theory of "Corporate Rights." After 1937,² the Courts shifted

² This is in part due to the New Deal and the "switch in time that saved nine." For more information, see Public Citizen, "A Constitutional Amendment to Keep Corporate Money out of Elections: Corporations Are Not People," <u>https://www.citizen.org/sites/default/files/difp-corporations-are-not-people-citizens-united-fact-sheet.pdf</u>

away from judicial activism for corporations until Lewis Powell wrote a memo to the U.S. Chamber of Commerce in 1970.

Do folks know what the US Chamber of Commerce is? It is a business oriented lobbying group; it is NOT a government agency

- The Chamber is the largest lobbying group in the U.S., spending more money than any other lobbying organization on a yearly basis.
- The Chamber was created in 1912 at the suggestion of President Taft as a counterbalance to the labor movement of the time.
- It is not the same as local chambers of commerce, which usually help connect small businesses. It is a lobbying group for major multinational corporations.

In the 1960s, public activism began to rise. This was the era of the Civil Rights Movement, and protests against the Vietnam War. It was also the era of the environmental movement and the consumer protection movement, and the birth of new laws with environmental, consumer, and worker safety protections. In 1971, Lewis Powell -- a lawyer who worked for tobacco companies at the time and later became a Supreme Court Justice -- wrote to the U.S. Chamber of Commerce saying the strides made by these popular movements were going to harm corporations, and that corporations needed to fight back in the courts. As a result, corporations ramped up the filings of lawsuit after lawsuit claiming corporate entities have the same constitutional rights as people. If corporations would win these claims, the government would have an incredibly difficult time regulating them.

Once Powell got on the Supreme Court, he decided many cases in favor of corporations having these and other rights. Since the memo, the Chamber have been increasingly successful in litigation. Under previous Courts, in the 70's - 90's, the Chamber was winning their cases 43% and 56% of the time; but, under the Roberts Court, the Chamber's success rate has climbed. As of June 21, 2012 they won 68% of their cases, many advocating for corporate rights.³ And at this point, nearly half of all First Amendment freedom of speech lawsuits in the federal courts benefit business corporate law at Harvard University has <u>called</u> the "corporate takeover of the First Amendment."

Hobby Lobby (2014) [not on the painting, but important to understand corporate rights]

Hobby Lobby isn't technically a First Amendment decision (it was decided under a federal statute called the Religious Freedom Restoration Act), but it's another example of how corporate rights hurt ordinary people. It said that corporations not only have a First Amendment right to speech, but some "closely held" corporations also have a right to freedom of religion. That right allows them to

³ Constitutional Accountability Center, "Corporations and the Supreme Court," <u>https://www.theusconstitution.org/corporations-and-supreme-court</u>

circumvent and invalidate government regulations that corporations argue violate their rights to freedom of religion. For example, in the *Hobby Lobby* case, a large retail-goods corporation claimed the right to a religious exemption from an employee health insurance requirement to provide coverage for certain forms of contraception. The company said its religion, which came from the five people who owned all the stock in the company, trumped a federal requirement that required this insurance benefit to be extended to the company's almost 30,000 employees. The Supreme Court agreed.

[note how the corporation's hand is holding Congress - ask who do people think benefit from this system or what people feel this means for them]

How does a big money system harm middle-class people, poor people, and people of color? A lot of people can guess right now that there is a political donor class, and there's the rest of us. In the <u>2016 election</u>, only 0.68% (less than 1%) of the population gave more than \$200 to a federal political campaign, and only 0.10% (1 in 1000 people) gave \$2,700 or more. But politicians pay the most attention to those people. Over <u>90 percent</u> of donations come from majority white neighborhoods. We're in a moment in which money, and political power, is incredibly concentrated. A donor class comprised of affluent people and corporations can spend unlimited amounts of money on elections. And they have very different views and demands than the rest of us. Members of this elite donor class have greater access to their elected officials– because elected officials are often already calling them for fundraising.

The policies that our representatives enact are skewed toward this same wealthy donor

class—in other words, the wealthy have better representation than the rest of us. Research shows that when it comes to economic policies, when the views of the wealthiest 10% conflict with those of the bottom 90%, the 10% trumps the 90%. (This comes from Demos <u>study</u>)

- That being said, money in politics is about more than any one issue it's really about how our government makes decisions on all the issues we face, and who is represented in our democracy.
- So the problem is about political inequality, but it's also closely linked to economic and racial inequalities.

Money in Politics Especially Harms People of Color and other Marginalized Communities Our political system is built off an economic system that is particularly harmful for people of color (POC), queer and trans folks, immigrants, poor people and other people who have been systematically excluded from economic opportunity by public and private actions ranging from land theft and slavery to present-day discrimination in hiring, housing, and education. The unequal influence of money in politics works in conjunction with past and present systemic racism, discrimination, and injustice. Systems of oppression that create economic inequality are intrinsically

tied to the unequal influence of money in politics, and those feeling the most harm from this unequal influence are those who are already facing discrimination, oppression, or domination in other areas. Money in politics functionally makes systems of oppression even more oppressive.

In 2014, Demos released a report called <u>Stacked Deck</u>, which links big money in politics and racial inequality. Demos has also done extensive research on the racial wealth gap and the <u>Asset Value of</u> <u>Whiteness</u>. We know that:

- Because of our country's history and present practice of excluding POC from our economy and our democracy (e.g., by discrimination in hiring, housing, and education), there are **gaps** of over \$100k in the median household wealth controlled by white families and families of color.
- In the LGBTQ community, in addition to racial inequality, we also see gaps in the **wealth** controlled by cis/straight people versus LGBTQ people.... which is linked to the fact that across the country, not all legislatures and courts are protecting LGBTQ people from discrimination.
- In addition to the violence and hostility that many transgender and gender nonconforming people face, especially black trans women and trans women of color, trans and gender non-conforming people are almost 4x more likely to live in extreme poverty than Americans as a whole... black trans and gender nonconforming people are 8.5x more likely to live in extreme poverty. Trans people of color are underrepresented in the donor class itself and at every level of government.

It's unsurprising that candidates of color, including LGBTQ candidates of color, are less likely to run in the first place, and raise less money when they do run. And for any candidate of any identity, the people who provide the money--which are the people who get the most access to the candidate to talk about the issues that matter to them--will be disproportionately white. Our country has basically created a <u>"wealth primary,"</u> by ensuring only those who are themselves wealthy, or whose positions appeal to wealthy donors, can run for office.

What that means is people with marginalized identities are underrepresented in the halls of power, and often face huge gaps in their control of wealth, including on bases of race and gender identity.

Side note: What about the 2016 presidential election? Does the success of Bernie Sanders and Donald Trump show that politicians can succeed even if they aren't the favorite candidates of wealthy funders? When people think about elections, they often think first of presidential elections. But presidential elections are the exception. People don't pay as much attention to races for Congress or state or local elections, and it's almost impossible to run for Congress on \$27 donations. Even to run for city council in a medium-sized city, candidates often must raise tens of thousands of dollars, typically from lawyers, real estate

developers, and business executives who have very specific preferences that may not match the general public's.

When you combine this with 4 decades of Supreme Court decisions empowering political donors to spend as much as they want, you get a system dominated by a really wealthy, white, and male donors, and a government skewed in favor of that "donor class" and against prioritizing the needs of POC, and LGBTQ and trans POC.

Policy Implications

Examples of how general public's policy values are different than those of the wealthy elites:

Policy	% Wealthy in Favor	% General Public in Favor
Government must see that no one is without food, clothing or shelter	43%	68%
Minimum wage high enough so that no family with a full-time worker falls below official poverty line	40%	78%
The government should provide a decent standard of living for the unemployed	23%	50%
The government in Washington ought to see to it that everyone who wants to work can find a job	19%	68%
The Earned Income Tax Credit (EITC) should be increased rather than decreased or kept the same	13%	49%
The federal government should provide jobs for everyone able and willing to work who cannot find a job in private employment	8%	53%

TABLE 1: JOBS & INCOME POLICY PREFERENCES OF AFFLUENT VS. GENERAL PUBLIC

SOURCE: Benjamin I. Page, Larry M. Bartels, and Jason Seawright, "Democracy and the Policy Preferences of Wealthy Americans," Perspectives on Politics [italicized] 11:1, pp. 51-73.

Examples of Political Spending that Hurts LGBTQ People / People of Color

Queer and Trans Rights

Below are examples from queer and trans activists on how the concentration of wealth and political power has hurt advocacy for queer and trans liberation:

- A ballot initiative seeking to repeal Massachusetts's recently-passed anti-discrimination protections for transgender people was funded almost entirely by wealthy, out-of-state donors. Because most transgender people <u>live in poverty</u>, the coalition supporting the anti-discrimination laws faced great difficulty in raising enough money to oppose this campaign.
- Queer and trans folks are incarcerated at disproportionate rates, especially LGBTQ youth and Black and brown queer and trans people. A 2015 study showed that 47 percent of black transgender people surveyed have been in jail. As founding director and former executive director of the national organization <u>Black and Pink</u> Rev. Jason Lydon has pointed out, in our criminal law system, private prisons and related businesses that profit from continued over-criminalization have an interest in judges who are "tough on crime." In states where judges are elected, these groups will lobby for these judges who support pro-incarceration policies because it benefits the private prisons and prison guard unions. In Massachusetts, a prison guard union is Governor Charlie Baker's top contributor after Charlie Baker himself and the Republican Party. In California, Democratic Governor Jerry Brown received millions of dollars in contributions from a prison guard union, as well as from private prison guard unions leads to policies that increase incarceration and dehumanize incarcerated LGBTQ people and people of color.
- As Mason Dunn, Executive Director of the <u>Massachusetts Transgender Political Coalition</u>, has explained based on his own advocacy over the years, organizers fighting for LGBTQ equality and racial justice are disadvantaged in their ability to buy media access. As a result, the companies and private wealth controlling the mainstream media have an upper hand in controlling the public narrative, often in ways that dehumanize LGBTQ people.

Immigration:

Jasmine Gomez from FSFP <u>wrote a report</u> on how money in politics affects immigration policy. This report really highlighted how this is a problem for both Democrat and Republican officials.

• In California, one private prison company donated over \$25,000 to the Democratic Governor of California, Jerry Brown, in 2010, and over \$50,000 in 2014. Another private prison company donated over \$60,000 to Brown's campaign in 2012. Governor Brown's re-election campaign also received over \$2 million from the California prison guards' union. Governor Brown subsequently vetoed legislation (overwhelming passed by the state house and senate) that would have prevented the use of private prisons as immigration "detention centers" -- jail cells known for their inhumane conditions including poor healthcare and education. Guards at private prisons have been known to sexually abuse transgender immigrant women, cis-women, and other queer people.

Harms to the Black Community

In <u>Demos's Stacked Deck</u>, there are "three case studies [that] demonstrate how big money thwarts progress on racial equity and a fourth shows how a fairer system for electing public officials can lead to policies that better serve our communities. These stories illustrate the two basic ways race interacts with our big money system. The first two case studies examine how the power of big money combined with systemic racism has fueled two of the most destructive policies targeted toward people of color: the prison industrial complex and predatory mortgage lending. The third and fourth case studies examine two ostensibly race-neutral policies—the minimum wage and paid sick days—that have disproportionate impact on the lives of people of color, who are over-represented among the working class."

- *Private Prisons and Incarceration.* Incarceration in the U.S. has increased by 500 percent over the past three decades, with people of color vastly over-represented in our nation's prisons and jails. This is the result of policies that have put more people in jail for longer sentences despite dropping crime rates, policies boosting the bottom line of the growing private prison industry.
- *The Subprime Lending Crisis.* Because of rampant discriminatory lending practices, the subprime-lending crisis hit people of color especially hard. Banks and other mortgage lenders used millions of dollars of political contributions and lobbying to weaken and circumvent consumer-friendly regulations, resulting in the largest loss of wealth in communities of color in American history.
- *The Minimum Wage.* The federal minimum wage has remained stagnant, losing real value over the past several decades. Raising the wage to \$10.10 an hour would lift more than 3.5 million workers of color out of poverty, but Congress has instead prioritized policies favored by the wealthy.
- *Paid Sick Leave.* The U.S. is one of the only prosperous democracies that does not guarantee even minimal paid sick leave to all employees, which would improve public health and disproportionately benefit Latino workers. A paid sick leave proposal was bottled up in the Connecticut legislature until the state passed a "fair elections" system that enabled candidates to run for office without depending upon wealthy donors and special interests. Following this change, Connecticut became the first state in the nation to guarantee paid sick leave."

Why is a constitutional amendment the best solution?

- <u>Congress can't fix our democracy alone</u>. The Supreme Court overturned Congress' bipartisan campaign finance rules. The best way to change the Supreme Court decision is through the a constitutional amendment.
- <u>The Supreme Court won't fix our democracy any time soon</u>. The President recently appointed Neil Gorsuch to the Supreme Court based on his previous court decisions,

Gorsuch seems to oppose limits on money in politics and may make it more difficult to enact protections for everyday people.

- <u>Supreme Court decisions are not permanent</u>. Even if the Supreme Court does overturn *Citizens United*, who is to say things wouldn't change again when the court makeup changes? Amendments, on the other hand, are permanent.
- <u>A grassroots, citizen-centered approach is best</u> everyday people know best what their communities need and what should be included in an amendment to get big money out of politics and to promote equality.

Can we pass an amendment?

- A constitutional amendment must first be passed by two-thirds of both houses of Congress, then ratified by 38 states.
- Passing an amendment is hard, but possible. Over the last century citizens in the U.S. have passed 10 constitutional amendments (about one per decade). It's our time for a new amendment.
- This isn't new. We have always had to fight to expand our democracy. But history shows that when everyday people engage, amendments expanding democracy pass.
 - 19th amendment women fought for decades to get basic rights, including the right to vote.
 - 24th amendment Many states, especially in the South, used to charge people a "poll tax" in order to vote. The people who could not afford to pay the tax were disproportionately people of color. When the Supreme Court decided to allow poll taxes to continue, despite evidence that they prevented people of color from voting, civil rights activists successfully pushed for an amendment that overturned that Supreme Court decision.
 - 26th amendment bipartisan youth advocated heavily for lowering the voting age to 18 years.

We can do it

- 19 states and over 700 communities have already joined the movement to pass a resolution to overturn *Citizens United*. More states join with every election.
- This is a bipartisan effort with popular support anywhere between 75 84 % of people agree that money has too much of an influence in politics, and in state after state, city after city, about 75% of the public supports a constitutional amendment. We are not in this alone.

What American Promise is Doing in [INSERT STATE] + how to get involved

[Reach out to American Promise or Free Speech For People to find out how people in your state can push locally to get big money out of politics and to end corporate personhood.]

Artist Talk Back

Michael Conroy may be available to video call for this event. Reach out to Michael at <u>mconroyart@gmail.com</u>.

Other Aspects of the Painting that were not addressed:

Not every part of the painting is covered in this curriculum; that being said, every community should decide for themselves what part of the art is relevant! Below are some of the pieces of the painting that we did not directly address in this curriculum.

- The person is <u>Alan Greenspan</u>
- The street names are from another documentary about <u>The Avenues in NY</u> highlighting income inequality.
- "Deregulation too big to fail" referring to the big banks that were bailed out during the recession