ency. The Court upheld these limits, writing that, in *Buckley*, it had "rejected the contention that $1,000, or any other amount, was a constitutional minimum below which legislatures could not regulate." [887] The relevant inquiry, rather, was "whether the contribution limitation was so radical in effect as to render political association ineffective, drive the sound of a candidate's voice below the level of notice, and render contributions pointless." [888]

In *McCutcheon v. Federal Election Commission*,[889] however, a plurality of the Court [890] appeared to signal an intent to more closely scrutinize limits on contributions to ensure a "fit" between governmental objective and means utilized.[891] Considering aggregate limits on individual contributions [892]—similar to the ones that were approved in *Buckley* as a means to prevent political corruption—the plurality opinion emphasized that the corruption rationale did not extend to preventing contributors from gaining influence over or access to elected officials. Instead, the Court asserted that the governmental interest identified in *Buckley* was a more narrow avoidance of *quid pro quo* corruption or the appearance thereof.[893] The aggregate limits had been previously upheld as a means to prevent individuals from giving unrestricted funds to groups most likely to direct money to a desired candidate, effectively circumventing the contribution rules. The plurality, however, noted that a variety of anti-circumvention laws and regulations had been implemented since the Court's decision in *Buckley*, thus undermining the rationale for aggregate limits. Distinguishing *Buckley* based on these facts, but without overruling its holding, the Court struck down the aggregate limits.

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[887] 528 U.S. at 397.

[888] 528 U.S. at 397.

[889] 572 U.S. ___, No. 12–536, slip op. (2014).

[890] Chief Justice Roberts wrote the plurality opinion, joined by Justices Scalia, Kennedy and Alito. Justice Thomas, concurring in judgment, declined to join the reasoning of the plurality, arguing that, to the extent that *Buckley* afforded a lesser standard of review to restrictions on contributions than to expenditures, it should be overruled.

[891] The Court declined to revisit the differing standards between contributions and expenditures established in *Buckley*, holding that the issue in question, aggregate spending limits, did not meet the demands of either test. 572 U.S. ___, slip op. at 10.

[892] In 2014, these aggregate limits allowed individuals to contribute up to $2,600 per election to a candidate, $5,000 per year to a Political Action Committee, $2,400 per year to a national party committee, and $10,000 per year to a state or local party committee. 2 U.S.C. § 441a(a)(1).

[893] In a dissenting opinion by Justice Breyer, joined by Justices Ginsburg, Sotomayor and Kagan, this characterization of the corruption rationale in *Buckley* (as well as in subsequent cases) was vigorously disputed. 572 U.S. ___, slip op. at 4–13 (Breyer, J., dissenting).