tion."[939] But the plurality struck down Vermont's contribution limits "based not merely on the low dollar amounts of the limits themselves, but also on the statute's effect on political parties and on volunteer activity in Vermont elections."[940]

Government as Regulator of the Electoral Process: Lobbying.—Legislators may depend upon representations made to them and information supplied to them by interested parties, and therefore may desire to know what the real interests of those parties are, what groups or persons they represent, and other such information. But everyone is constitutionally entitled to write his congressman or his state legislator, to cause others to write or otherwise contact legislators, and to make speeches and publish articles designed to influence legislators. Conflict is inherent. In the Federal Regulation of Lobbying Act,[941] Congress, by broadly phrased and ambiguous language, seemed to require detailed reporting and registration by all persons who solicited, received, or expended funds for purposes of lobbying; that is, to influence congressional action directly or indirectly. In *United States v. Harriss*,[942] the Court, stating that it was construing the Act to avoid constitutional doubts,[943] interpreted covered lobbying as meaning only direct attempts to influence legislation through direct communication with members of Congress.[944] So construed, the Act was constitutional; Congress had "merely provided for a modicum of information from those who for hire attempt to influence legislation or who collect or spend funds for that purpose," and this was simply a measure of "self-protection."[945]

Other statutes and governmental programs affect lobbying and lobbying activities. It is not impermissible for the Federal Government to deny a business expense tax deduction for money spent to defeat legislation that would adversely affect one's business.[946] But the antitrust laws may not be applied to a concert of business enterprises that have joined to lobby the legislative branch to pass and the executive branch to enforce laws that would have a detri-

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[939] 548 U.S. at 249 (citation omitted). The plurality noted that, "in terms of real dollars (*i.e.*, adjusting for inflation)," they were lower still. Id. at 250.

[940] 548 U.S. at 253.

[941] 60 Stat. 812, 839 (1946), 2 U.S.C. §§ 261–70.

[942] 347 U.S. 612 (1954).

[943] 347 U.S. at 623.

[944] 347 U.S. at 617–24.

[945] 347 U.S. at 625. Justices Douglas, Black, and Jackson dissented. Id. at 628, 633. They thought the Court's interpretation too narrow and would have struck the statute down as being too broad and too vague, but would not have denied Congress the power to enact narrow legislation to get at the substantial evils of the situation. *See also* United States v. Rumely, 345 U.S. 41 (1953).

[946] Cammarano v. United States, 358 U.S. 498 (1959).