a significant burden to another,[872] the majority distinguished those cases as not having involved the provision of subsidies to directly counter the triggering speech.[873]

It was mentioned above that the Court in *Buckley* upheld the disclosure requirements of the Federal Election Campaign Act. The Court found that, although compelled disclosure "cannot be justified by a mere showing of some legitimate governmental interest," the governmental interests in the disclosure that the statute in *Buckley* mandated were "sufficiently important to outweigh the possibility of infringement" of the First Amendment.[874] Disclosure, the Court found, "provides the electorate with information 'as to where political campaign money comes from and how it is spent by the candidate' "; it deters "actual corruption and the appearance of corruption"; and it is "an essential means of gathering the data necessary to detect violations of the contribution limitations" that the statute imposed.[875]

The Court indicated, however that, under some circumstances, the First Amendment might require exemption for minor parties that were able to show "a reasonable probability that the compelled disclosure of a party's contributors' names will subject them to threats, harassment, or reprisals from either Government officials or private parties." [876] This standard was applied both to disclosure of contributors' names and to disclosure of recipients of campaign expenditures in *Brown v. Socialist Workers '74 Campaign Committee*,[877] in which the Court held that the minor party had established the requisite showing of likely reprisals through proof of past governmental and private hostility and harassment. Disclosure of recipients of campaign expenditures, the Court reasoned, could not only dissuade supporters and workers who might receive reimbursement for expenses, but could also dissuade various entities from performing routine commercial services for the party and thereby "cripple a minor party's ability to operate effectively." [878]

The Court has apparently extended the reasoning of these cases to include not just disclosure related to political contributions, but also to disclosure related to legally "qualifying" a measure for the ballot. In *Doe v. Reed*,[879] the Court found that signing a petition to initiate a referendum was a protected form of political expres-

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[872] Slip op. 10–11 (Kagan, J., dissenting).
[873] Slip op. at 17.
[874] 424 U.S. at 64, 66. *See also* Amendment I, "Political Association," *supra*.
[875] 424 U.S. at 66, 67, 68.
[876] 424 U.S. at 74.
[877] 459 U.S. 87 (1982).
[878] 459 U.S. at 97–98.
[879] 561 U.S. ___, No. 09–559, slip op. (2010).