held by shareholders—namely, constitutional rights of due process, free speech (seen as money contributed to political campaigns and spent on the media), freedom of religion, and freedom from unreasonable search and seizure and double jeopardy.

Bear in mind the Mitt Romney quote from the 2012 presidential election: “Corporations are people, my friend. . . . Everything corporations earn eventually goes to people.” He neglected to say which people.

In 1889, the court overtly granted due process protections of the Fourteenth Amendment to corporations; in 1893, it was Fifth Amendment protections of double jeopardy; in 1906, Fourth Amendment protections from unreasonable search and seizure; and in 1978, the First Amendment right to make contributions to ballot initiative campaigns.

In the latter case, the metaphor was extended: Though a corporation could not go to the polls and vote, as a “person” it has the right of free speech since its shareholders have the right of free speech. Then a further metaphor: Speech as Money going to campaigns—not for candidates (real people) but for policies affecting corporations. It was a step toward Citizens United.

Interestingly, Citizens United is not directly about corporate personhood and does not depend on that general metaphor. It depends instead on two other metaphors.

- Money Is Speech
- Nonpersons Have the Right to Speech

These two metaphors form a logic: People have a right to as much speech as they want. Since money is speech and nonpersons have the right to speech, it follows that nonpersons have the right to spend as much money as they want on elections.

This 5-to-4 vote by a conservative court was politically motivated. Corporations have much more money to spend on political campaigns than do unions. This ruling gives a huge amount of money to conservatives and hardly any to progressives. Speech, as we have seen, is not just sounding off. If framed and targeted carefully, Citizens United allows conservatives to