

MANUFACTURING THE GRASSROOTS:

THE CONSULTANCY FORM, THE SIMULATED
PUBLIC, AND THE REMOVAL OF MĀORI WARDS
IN AOTEAROA NEW ZEALAND, 2021-2025

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ABOUT CARE

The Center for Culture-Centred Approach to Research and Evaluation (CARE) at Massey University, Aotearoa New Zealand, is a global hub for communication research that uses participatory and culture-centred methodologies to develop community-driven communication solutions to health and wellbeing. Through experiments in methods of radical democracy anchored in community ownership and community voice, the Centre collaborates with communities, community organisers, community researchers, advocates and activists to imagine and develop sustainable practices for prevention, health care organising, food and agriculture, worker organising, migrant and refugee rights, indigenous rights, rights of the poor and economic transformation.

Prof Mohan J Dutta is the Director of CARE and author of books such as *Neoliberal Health Organizing*, *Communicating Health*, and *Voices of Resistance*.

This paper analyses campaigns conducted against Māori constitutional and electoral representation, and against tobacco control in a country where smoking kills Māori at far higher rates than other New Zealanders. It reproduces campaign material, including images of Māori people used without their consent, as evidence for analysis. We encourage you to care for your safety and wellbeing while reading this paper.

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MANUFACTURING THE GRASSROOTS:

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EXECUTIVE SUMMARY

A public is not a natural object. Somebody assembles it, and the question a democracy has to keep asking is who, with what money, and whether the people who make up that public can find out in time for the knowledge to be worth anything. Between 2021 and 2025 in Aotearoa New Zealand a substantial part of that assembly work was done by a firm most voters have never heard of, on behalf of clients including two tobacco multinationals and a lobby organisation dedicated to removing Māori collective rights, inside a regulatory architecture that required almost none of it to be declared.

The Campaign Company Limited was incorporated on 4 November 2021 under the business classification of public affairs consultant service. Jordan Williams is its founder and chief executive, and was its sole director from incorporation until January 2026; 980 of its 1,000 shares are held jointly by Williams, a second individual and a corporate trustee company.^{1,2} Williams is also co-founder and executive director of the New Zealand Taxpayers' Union and a co-founder of the Free Speech Union.³ Its documented clients and domain registrations across 2021 to 2025 include Groundswell NZ, Hobson's Pledge, a tobacco industry front campaign run for British American Tobacco New Zealand and Imperial Brands, and the Sensible Sentencing Trust.⁴ The firm operates from a signed commercial frontage on the Auckland waterfront at Unit 6, 143 Quay Street.²

I make five arguments. The first concerns institutional form. A think tank must argue in its own name and a party must file returns, and both carry their authorship on their faces, which is the source of their authority and the limit of their reach. A campaign consultancy resolves that limit. It has no public position to be discounted, no membership to answer to, no charitable purpose to be tested and no obligation to appear in any register of political actors. It sells the one commodity the advocacy organisations cannot manufacture for themselves, which is the appearance of not being them. Its commercial value is a direct function of its invisibility, so any proposal to make it visible is a proposal against its business model rather than a compliance cost within it.

The second concerns the operation itself. Across all five campaigns examined here the same three-part template recurs. A sympathetic proxy with genuine vulnerability is placed at the front: a farmer, a migrant shopkeeper, a multicultural New Zealand, a kuia. The moral position of the parties is then transferred, so that the measure protecting people becomes the thing threatening the proxy. And the people the measure was designed to protect are removed from the frame, because their presence would restore the original relation. Inversion is more durable than lying because it makes no factual claim that a fact can refute. It reassigns who is wronged.

The third concerns representation. These campaigns are, by any audit of who appears in them, strikingly diverse. A Māori man in business clothing, a young woman in a hijab, a migrant dairy owner, a kuia with moko kauae, a Māori mayor, a Māori councillor, two young women members of Parliament. Every one of those appearances was made without the standing to shape the claim, and in at least three documented instances the person depicted publicly opposed the message their image was carrying. Under conditions of purchasable imagery, representation and voice do not merely differ. They can vary inversely, because the diversity of the image is precisely what licenses the claim the campaign is making against the people depicted.

The fourth concerns structure, and it is the finding with the widest application beyond this country. At the 2025 local elections, 42 councils held binding referendums on Māori wards. Across the country 542,134 votes were cast to keep them and 467,923 to remove them, a national majority of about 74,000 in favour of retention. Eighteen councils kept their wards and 24 removed them, and the removals bind until 2031.^{5,6} The decision that produced that result was taken in Parliament rather than in any campaign: the choice to require 42 separate polls instead of one national question converted an argument the removalists were losing into 42 small ones, several decided by a few hundred votes. No amount of persuasive counter-speech could have altered that arithmetic, because the arithmetic was never in the domain of speech. I name this unit disaggregation and treat it as a structural technique in its own right.

The fifth concerns remedy. Every campaign in this corpus was exposed, most of them promptly and well, by RNZ, Newsroom, The Post, the New Zealand Herald and specialist monitoring projects. The exposure did not restore the position. A campaign's product is delivered at the moment of circulation, and circulation completes before the investigation is published. A repeal argument that has entered the political vocabulary does not leave it when its origin is disclosed, and a referendum decided in October is not undecided by an adverse advertising ruling that arrives after the vote. Remedies that operate downstream of circulation are mistargeted by design. Regulation has to reach authorship, at the point of reading.

I hold the causal claims tighter than the commentary around this subject usually does. The public record establishes that the firm was the digital vendor to several of the principal organisations campaigning against Māori rights and against tobacco control. It does not establish that the firm authored the strategy. On the 2025 anti-wards billboards, the Advertising Standards Authority's decision on the complaints records the firm as the agency that responded on Hobson's Pledge's behalf; I treat that as documenting the agency relationship and make no claim about who designed the billboards. What the record does establish is more consequential for policy than any single attribution: a market now exists in Aotearoa for the manufacture of simulated publics, it is cheap, it is lawful, and its most sustained domestic application has been directed at the constitutional and electoral standing of tangata whenua.

1. INTRODUCTION: THE NAME ON THE GLASS

On a summer evening in January 2025 I walked along the public boardwalk on the Auckland waterfront and photographed a shopfront. The glass carries a name and a logo at eye height, a doorbell, and a small sign asking visitors to ring for attention. Behind it, the harbour. The firm is The Campaign Company, and there is nothing furtive about the premises at all.



Figure 1: The premises of The Campaign Company Limited, Unit 6, 143 Quay Street, Auckland Central, photographed from the public walkway outside on 12 January 2025. A small placard is visible on the interior wall behind the window signage; its text is not legible in this photograph and I make no claim about it. On the photographic method and its ethics, see note [60].

That is the fact I want to hold at the front of this paper, because it corrects the instinct that usually organises writing about covert political communication. The firm is not hidden. It is incorporated, classified in the register as a public affairs consultant service, directed by a man who gives interviews under his own name, and marked on the glass in letters half a metre high.^{1,2,3} What is hidden is never the firm. What is hidden is the relationship between the firm and the campaigns it builds, and that relationship is hidden at exactly one point, which is the point at which a voter encounters the campaign. A disclosure regime designed to make organisations visible finds nothing wrong here, because the organisation was never invisible. Only the authorship was.

Three years before I took that photograph, a domain registration made the same point in the other direction. On 14 November 2021 the domain motherofallprotests.nz was created, and the registrant recorded on it was the New Zealand Taxpayers' Union.⁷ The protest it promoted was presented to the country as a farmer revolt, a national mobilisation of Groundswell NZ, and nothing in the coverage mentioned a lobby organisation in Wellington. Once the registration was noticed and raised in public, the details were changed, first to The Campaign Company and then to Groundswell itself.^{7,8} Nothing about that sequence is mysterious. It is the ordinary administrative residue of an infrastructure that was never built to be read by the people it addresses. The question worth asking is not how the registration was found. It is why it mattered so much that it be moved.

I write this paper from Palmerston North, in a region whose councils and marae both had a stake in almost every question examined here, and in a country where the last five years have produced a sequence of campaigns that look, at first encounter, like the public speaking to itself. Tractors in provincial main streets. A website about belonging, addressed to migrants. A petition to save the corner dairy. A billboard in the Green Party's own visual language. A kuia with moko kauae above the words my mana doesn't need a mandate. Each of those was made by someone, for someone, with a budget. In all five cases the record now tells us by whom, though in the fifth it took a regulator's decision to say so, and I set out what the decision does and does not establish.

The culture-centered approach reads communication as the site where structures are held in place or opened up. Structures are the rules, resources and institutions that distribute what can be said and heard. Culture is the field of meanings through which people make sense of those structures. Agency is the everyday capacity to negotiate, resist and remake them.⁹ Voice, in this account, runs on infrastructure rather than on individual attributes: the platforms, budgets, staff, databases, legal forms and access points that decide whose account of a policy reaches a public and whose does not.¹⁰ Read this way, the harm of a manufactured grassroots campaign is not principally that it deceives an audience about who is speaking. The harm is that it occupies the communicative space in which an actual public might have formed, and it occupies that space with the resources of capital rather than the resources of association. The deception is the mechanism. The occupation is the injury.

The organising concept I use throughout is communicative inversion, the technique by which a communicative act describes itself as the opposite of what it materially does.¹¹ Inversion is the signature of settler colonial communication, because settler colonialism has to present itself as the ordinary condition of things rather than as a continuing structure of dispossession.¹² The campaigns examined here inverted at every level. Equality named the removal of representation. Belonging named a campaign against the standing of the people who host belonging. Public health named a threat to a migrant family's livelihood. Grassroots named a company with a lease on Quay Street.

2. EVIDENCE, INFERENCE AND THE LIMITS OF THIS ANALYSIS

Work on covert political communication invites overclaiming. A researcher who finds a domain registration wants it to prove authorship of a movement, and it does not. To keep this analysis usable in a policy setting and defensible in a legal one, I sort every factual claim into three classes and mark the class wherever the distinction matters.

Documented claims rest on a primary record a third party can inspect: a Companies Office register entry, an electoral return filed with the Electoral Commission, a domain registration record, an Advertising Standards Authority decision, an Act of Parliament, a council's declaration of a referendum result, an organisation's own published statement. Reported claims rest on journalism by named outlets that has not been retracted, principally RNZ, Stuff, Newsroom, the New Zealand Herald, 1News, Local Democracy Reporting and Te Ao Māori News. Analytic inferences are mine. They interpret the documented and reported material through the culture-centered approach, and they are argued rather than proven.

Every factual assertion carries an endnote, and every endnote was checked in October 2026 against the record it names. Where a primary record exists I cite it and name the fields I rely on, so that a reader can retrieve it independently rather than resting on my reading of it. Two compiled sources recur, the Astroturfing NZ investigation of March 2024 and Bryce Edwards's Lobbying and Influence Register entry on the company. I use them only where they reproduce or link an inspectable primary record, and I name that record rather than the compilation.^{2,4}

One claim in particular requires the distinction to be made sharply. The record establishes that The Campaign Company has been the registrant or administrative contact for Hobson's Pledge domains and operated the We Belong Aotearoa website and social presence in 2023.^{13,14} For the 2025 campaign against Māori wards, the Advertising Standards Authority's decision on the billboard complaints records The Campaign Company as the agency that responded on Hobson's Pledge's behalf.¹⁵ That establishes the agency relationship. It does not establish who designed the campaign or its creative, and I do not claim it. I therefore analyse the 2025 campaign as a Hobson's Pledge campaign conducted through a documented agency relationship with the firm, and I mark the limit of that record in the text, in the linkage register and in the figures.

Five limits follow. The domain records I rely on were read from captures dated March 2024 rather than from live queries, and the sequence of earlier registrants for motherofallprotests.nz rests on contemporaneous screenshots and reporting rather than on the register itself.⁷ The company's client list is not public, so the documented record captures only those engagements that surfaced through electoral returns, domain records, regulatory decisions or journalism, and the true extent of the work is unknown to me and to everyone outside the firm. Platform advertising archives report spending in wide bands and disclose no targeting parameters, so claims about audience segmentation remain inferential. This paper analyses the production of campaigns rather than their reception, which means it establishes what was made available for interpretation rather than what audiences did with it. And the account of what it cost Māori communities to meet these campaigns rests on published reporting rather than on conversations with the whānau, hapū and organisers concerned. The culture-centered approach treats that last limit as serious. Those conversations are the next phase of this work and they belong to the people who would be in them.

A word on standpoint. I direct a research centre anchored in Te Tiriti o Waitangi and in partnership with communities at the margins, and that centre has itself been the object of campaigns by organisations discussed in this paper. I declare that rather than bracket it. The pretence of a view from nowhere is itself a technique of erasure. The more useful discipline is to state the location and then submit the evidence to scrutiny, which is what the endnotes and Appendix A are for.

3. THE CONSULTANCY AS A POLITICAL FORM

3.1 *What the register shows*

The Campaign Company Limited was incorporated on 4 November 2021, company number 8257633, with the business classification M696275, public affairs consultant service. Nine hundred and eighty of its 1,000 shares are held jointly by Bermuda Corporate Trustee Limited, Jordan Williams and Emily Elizabeth Hughes, and Williams and Hughes hold 10 shares each. Williams is described as founder, owner and chief executive. He was the company's sole director from incorporation until 1 January 2026, when Hughes was appointed a second director. Ani O'Brien is its general manager, and the firm had approximately seven staff as of 2023. Its registered office is Unit 6, 143 Quay Street, Auckland Central.^{1,2}

Williams co-founded the New Zealand Taxpayers' Union in 2013 and remains its executive director, although in August 2026 he announced that he will stand down once referenda legislation passes. He co-founded the Free Speech Union and sits on its council.³ He has chaired the World Taxpayers' Associations since 2023, having joined its board in 2019. He completed Atlas Network's Think Tank MBA training in 2015 and its Smith Fellowship, as an alumnus of which Atlas profiled him in March 2018, and he has stated publicly that Atlas prize money and other Atlas funding never amounted to more than one or two percent of the Taxpayers' Union's annual income.^{16,17} The Auckland Ratepayers' Alliance, which he previously directed, was folded into the Taxpayers' Union in 2021.¹⁸

Set out that way, the arrangement can look like nothing more than a busy career. Read structurally, it is something more specific. The advocacy organisations in this cluster share a permanent problem, which is that their arguments are known to be theirs. A Taxpayers' Union media release about water regulation is read as a Taxpayers' Union media release. A Hobson's Pledge statement about co-governance is discounted in advance by everyone not already persuaded. In the terms of the political economy of communication, these organisations carry a legitimacy deficit that no additional spending in their own name can close, because spending in their own name is the source of the deficit.¹⁹

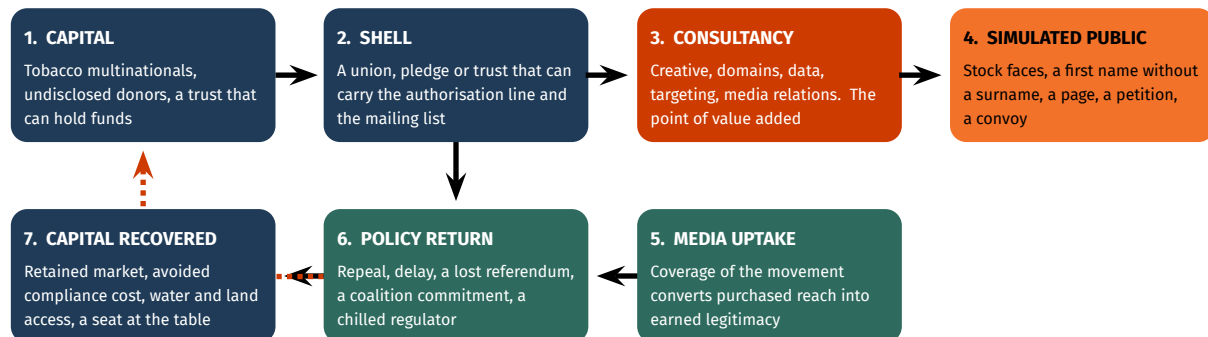
A consultancy resolves that. The domain is registered to a company rather than to the group. The website carries no logo. The page has a name that sounds like a community. The people in the photographs are unknown, which is the point, because a known face brings an affiliation with it and an unknown face brings only the impression of ordinariness. What is being commodified here is unusual and worth naming precisely. It is not attention, which is the commodity of the advertising industry, and it is not data, which is the commodity of the platform.²⁰ It is legitimacy, and specifically the legitimacy that attaches to speech understood to be uncompensated. A person who signs a petition because she believes her neighbours started it provides something that cannot be bought directly. The consultancy manufactures the conditions under which she provides it.

3.2 *The circuit*

Astroturfing is usually described as a deception, which locates it in ethics. It is more useful to describe it as an investment, which locates it in political economy. Capital enters the circuit at one point and returns to it at another, enlarged. The classic account of the American public affairs industry establishes that grassroots mobilisation is routinely subcontracted, that the subcontracting is invisible to participants, and that its effectiveness depends on that invisibility.²¹ The tobacco control literature, built from documents that litigation forced into the public archive, establishes the same operation in a single policy domain across four decades: the deliberate creation of ostensibly independent citizen organisations, the recruitment of small retailers as the sympathetic face of multinational objections, and the standard discursive repertoire of catastrophic consequence, small business victimhood and threatened freedom.^{22,23,24}

THE CIRCUIT: WHERE THE MONEY ENTERS AND WHAT RETURNS TO IT

The seven stages by which a client interest is converted into a public, and a public into a policy outcome



Reinvestment: each completed cycle enlarges the budget of the next one, which is why declared third-party spending rose 13-fold between the 2020 and 2023 general elections.

WHO PAYS FOR THE CIRCUIT

Communities bearing the harm

Māori whānau at the 24 councils that removed their wards, until at least 2031; smokers and their families; the people downstream of the waterways

People used as raw material

The kuia whose moko kauae carried a message she opposed; the dairy owner given a first name and no surname; the members of Parliament whose faces were borrowed

The commons of deliberation

Every genuine community campaign from here on is met with the reasonable suspicion that somebody paid for it, and only the funded side can buy its way past that

Figure 2: The circuit. Capital enters through a client or donor, passes through an advocacy shell able to hold funds and carry an authorisation line, is converted by the consultancy into a simulated public, is amplified into earned legitimacy, and returns as a policy or electoral outcome with measurable value to the original investor.

Two features of the circuit matter for policy. The returns are large relative to the outlay: the Smokefree retail reduction, had it proceeded, would have removed roughly nine in 10 tobacco outlets from the New Zealand market, and the advertising spend documented for the campaign against it is trivial against the revenue at stake.^{25,26} And the circuit is self-financing across cycles, because a policy win is the most persuasive fundraising document an advocacy organisation can produce. That is why declared third-party spending has the shape set out in Figure 4.

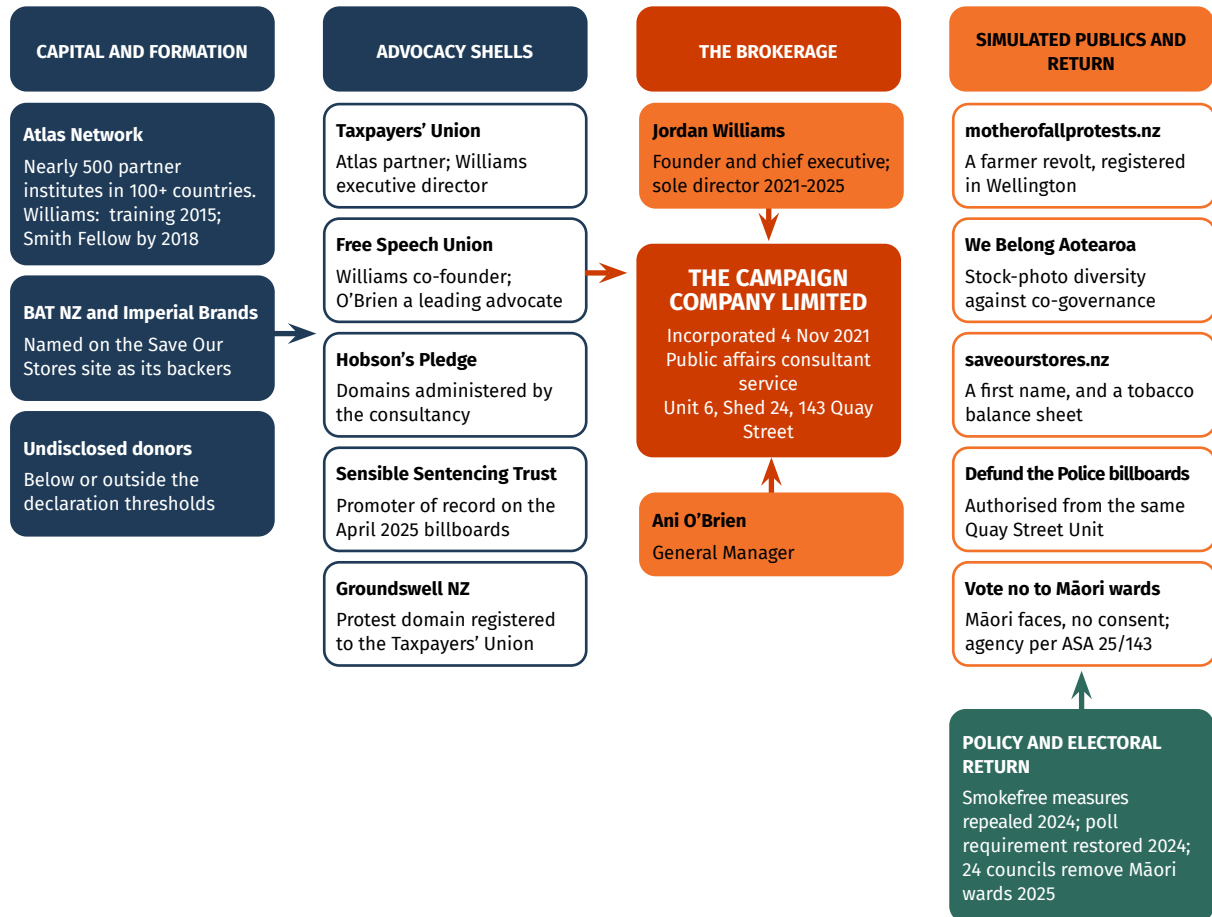
3.3 The transnational dimension

The Atlas relationship is debated in New Zealand in terms that mostly miss its significance. Defenders correctly note the small sums, and critics sometimes imply a chain of command the evidence does not support. Both framings measure the wrong thing. What a transnational advocacy network transfers is organisational technology: the naming conventions, the supporter-list architecture, the sequence in which a campaign is launched, the framing of every regulatory question as a question about the ordinary person's freedom, and the specific technique of recruiting a sympathetic small proprietor as the face of a corporate objection. The scholarship on the network documents exactly this templating function, industrialised through training programmes, seed funding and fellowship pipelines across what the network itself now counts as nearly 500 partner institutes in more than a hundred countries.^{16,27,28}

The evidence of transfer is in the output rather than in the ledger. In 2008, British parliamentarians were approached by a Save Our Shops campaign they understood to represent independent retailers objecting to cigarette display rules. In 2023, New Zealanders were approached by Save Our Stores.²⁵ The two share more than a name. They share a template, and templates travel more cheaply than money.

MAPPING THE LINKAGES: CAPITAL, SHELLS, BROKERAGE, SIMULATED PUBLIC

Only relationships evidenced in a company register, a domain record, an electoral return, a regulatory decision or named reporting



READING THE MAP

Almost every edge here is publicly declared or publicly discoverable. Atlas publishes its partners. The Companies Office publishes directorships. The .nz register publishes registrants. The Advertising Standards Authority publishes the authorisation line. What is hidden is not the network. What is hidden is the relationship between the network and the campaign it funds, at the one moment that matters, which is the moment a voter reads the campaign. A think tank must argue in its own name. A consultancy need not, and it sells the one commodity the shells cannot manufacture for themselves, which is the appearance of not being them.

Figure 3: Mapping the linkages. Only relationships evidenced in a company register, a domain record, an electoral return, a regulatory decision or named reporting are drawn. The brokerage sits at the analytic centre because it is the point at which authorship becomes deniable.

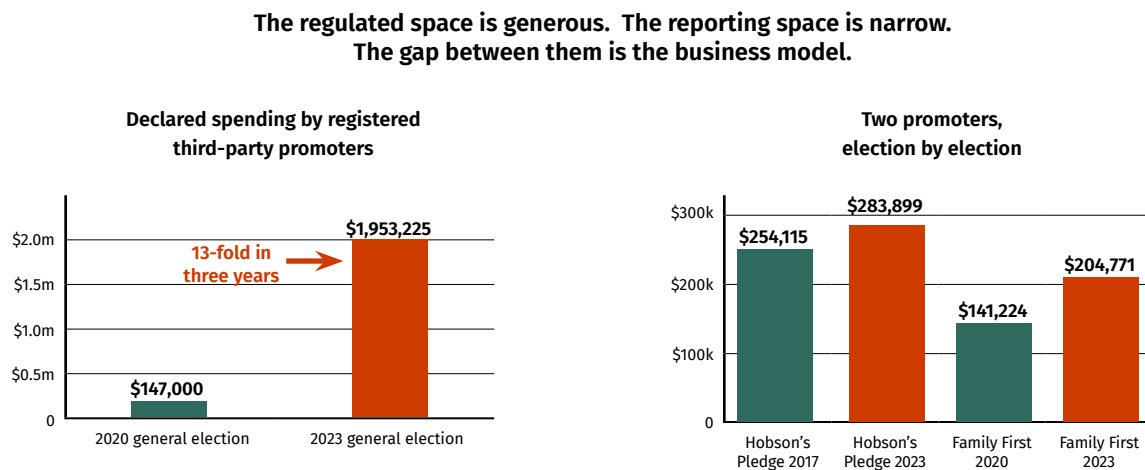
4. THE STRUCTURAL OPENING: WHAT THE LAW DOES NOT SEE

None of this would be worth a white paper if the law caught it. The law does not, and the reasons are structural rather than accidental. New Zealand's electoral finance regime regulates promoters by expenditure threshold rather than by authorship. A promoter that spends, or intends to spend, more than the unregistered limit must register, but need file an expense return only if it spends more than \$100,000 in the regulated period. At the 2023 general election 32 promoters were registered and 25 filed no expense return, which means that for the great majority of registered third-party activity there is no public record of what was spent or on what.^{29,30} Advertising that criticises a party's position without being reasonably regarded as encouraging a vote for or against that party is not an election advertisement at all and falls outside every spending limit which creates a direct incentive to design campaigns that attack without asking for a vote. For the 2026 general election an unregistered promoter may spend \$17,000 and a registered promoter \$424,000, within a regulated period of 13 weeks; outside that window no spending limit applies at all.²⁹

Most consequentially, nothing in the regime requires a campaign to name the client who commissioned it or the firm that built it. Disclosure attaches to the promoter, and a promoter can be a trust established for the purpose. Declared spending by registered third-party promoters rose from about \$147,000 at the 2020 general election to about \$1.95m in 2023, a 13-fold increase in a single electoral cycle, and the observable portion is by construction the smaller portion.^{30,31} The 2020 figures excludes spending on that year's two referendums, which was counted separately and was itself substantial. The Electoral Amendment Act 2025 moved against the grain of every warning in this area, ending election-day enrolment, extending the voting ban to every sentenced prisoner for offences committed after it took effect, and raising the threshold above which a party must disclose a donor's identity from \$5,000 to \$6,000.³²

THE STRUCTURAL OPENING: MONEY THAT NEVER HAS TO SAY WHERE IT CAME FROM

Third-party promoter activity, and the thresholds that keep most of it outside public reporting



FOUR OPENINGS IN THE RULES

Only promoters spending above \$100,000 must file an expense return. Of 32 registered promoters in 2023, 25 filed nothing. Advertising not reasonably regarded as encouraging a vote for or against a party falls outside every spending limit. For 2026 an unregistered promoter may spend \$17,000 and a registered promoter \$424,000, within a regulated period of 13 weeks. Nothing in the regime requires a campaign to name the client who commissioned it, or the firm that built it.

Figure 4: The structural opening. Declared third-party promoter spending, and the thresholds that keep most third-party activity outside public reporting. The regulated space is generous, the reporting space is narrow, and the gap between them is where the consultancy operates.

Local government is worse. Binding referendums that decide questions of constitutional significance, including the 42 Māori ward polls of 2025, sit almost entirely outside the electoral finance regime that governs general elections. A national lobby organisation may run a coordinated billboard and digital campaign across dozens of districts with no registration, no spending cap and no expense return, in contests where a few hundred votes decide the outcome. That is not a loophole. It is the design.

5. FIVE CAMPAIGNS

I take five campaigns in chronological order, because the sequence is itself a finding. Concealment moves from reactive to designed to unnecessary. The target moves from a policy to a person. And the source of the borrowed legitimacy moves from generic ordinariness toward the specific identities of the people the campaign is acting against.

5.1 Groundswell and the protest registered in Wellington, 2021

Groundswell began in Gore. On 8 October 2020 its founders, Bryce McKenzie and Laurie Paterson, organised a tractor protest through the town's main street against new freshwater rules, and more than 100 tractors and other vehicles took part. Nine months later, on 16 July 2021, the movement staged Howl of a Protest across towns and cities nationwide, against freshwater standards, winter grazing rules, indigenous biodiversity protections and the vehicle emissions scheme its opponents called the ute tax. In November it staged a further nationwide mobilisation, promoted as the Mother of All Protests, and widened its agenda to include Three Waters.^{8,33}

The grievances were real and they were held by real people. Compliance costs were rising. Consultation had been conducted at a distance from the people it affected. There was an accumulating sense in rural districts of having become a policy problem rather than a constituency. I state that plainly because the analysis that follows is not an argument that farmers were dupes. Co-option does not invent a feeling. It finds one and supplies it with an infrastructure.



Figure 5: The digital hub of the Groundswell NZ mobilisation. The central page carried protest logistics, live updates and guidance on acceptable signage, which is to say guidance on which grievances would be visible in the photographs that circulated afterwards.

The documented linkage is narrow and I state it narrowly. The domain motherofallprotests.nz was created on 14 November 2021 with the Taxpayers' Union recorded as registrant, and the registration was updated to The Campaign Company and later to Groundswell after the original entry was raised in public.^{7,8} In June 2021 a Taxpayers' Union update, promoting the Union's own Stop Three Waters roadshow, thanked Groundswell for organising town-hall meetings with Peter Williams.³⁴ Groundswell's founders have themselves said that they used the same digital contractor as the Taxpayers' Union, which had referred them to it, and the New Zealand Herald carried sponsored content paid for by the firm in July 2022.^{35,36} What the record establishes is that a lobby organisation and its director's consultancy supplied digital infrastructure to a movement presented to the country as farmer-led, and that this fact was moved out of view as soon as it became visible. What the record does not establish, and I do not assert, is that the Taxpayers' Union created Groundswell.



Figure 6: Tractor convoy during Howl of a Protest, July 2021, as posted on Groundswell NZ's public page. The iconography of agricultural machinery in urban streets performed the claim that the countryside had come to the city because the city would not come to it.

The inversion here is the clearest of the five. Rules limiting the discharge of agricultural effluent into waterways were recast as an assault on a way of life. That is inversion in the strict sense, because the material relation runs the other way: the rules exist because the discharge reaches people downstream, including hapū whose relationship to those waterways is constitutive rather than recreational. The co-option operates on rural identity, which the campaign required to be singular. There is no such thing as the farmer in the sense the campaign needed. There are dairy conversions and hill country sheep operations with opposed economic interests, farm workers on wages, women whose labour sustains farms and whose standing inside farming organisations is contested, and Māori agribusiness entities with kaitiaki obligations written into their governance. All of that heterogeneity had to resolve into one figure with one grievance. The erasure is the third operation and the least remarked: Māori environmental authority, expressed through kaitiakitanga and through settlement instruments giving iwi standing in freshwater governance, was absent from a campaign entirely about freshwater governance.

The structural lesson is that concealment in 2021 was reactive. The registration changed only after somebody asked. Everything that follows builds the concealment in at the design stage.

5.2 We Belong Aotearoa and the purchased photograph, 2022 to 2023

Hobson's Pledge campaigns against what it calls race-based privilege, which in practice means against Māori collective rights recognised under Te Tiriti o Waitangi. In 2022 and 2023 a website and social presence appeared under the name We Belong Aotearoa, addressed particularly to migrant communities, making a warm and inclusive case against co-governance without initially disclosing its origin. RNZ established that the site and its social presence were run by The Campaign Company, and that the same company was listed as registrant or administrative contact for further domains associated with Hobson's Pledge, including isthisracist.nz, bottomline.nz and equalhealth.nz.^{13,14,37} The .nz record for webelong.co.nz gives the registrant as Campaign Company, registered 19 May 2023.¹³ A line naming Don Brash was added at the foot of the site in August 2023, in dark type on a dark background.

RNZ also established that every portrait on the site was a stock photograph, carrying the descriptive metadata of commercial libraries, and reported the platform advertising figures for the We Belong and Hobson's Pledge pages across that year.¹⁴

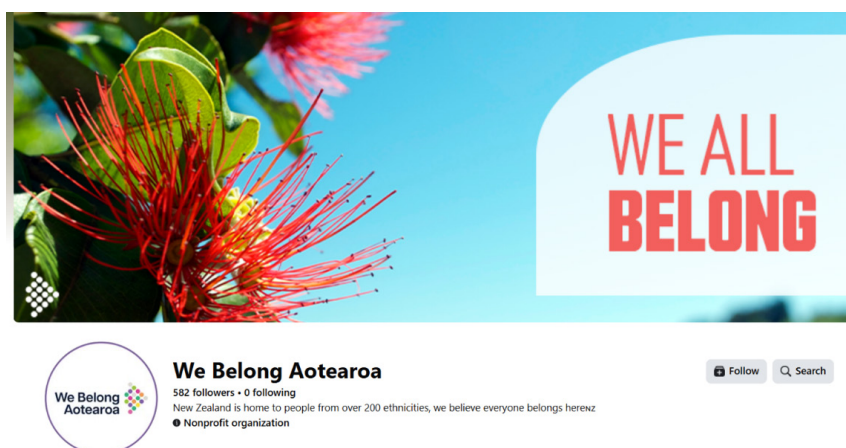


Figure 7: The We Belong Aotearoa social media presence. The visual grammar is that of a community initiative, and the absence of any organisational mark is the design decision that makes the grammar work.

This is the clearest instance of communicative inversion in the corpus and the mechanism deserves to be slowed down. The campaign did not argue against inclusion. It argued for it. Its name asserts belonging, its imagery asserts a multicultural New Zealand, and its stated principle is that all New Zealanders should be

treated equally. Every element of that is drawn from the moral vocabulary of anti-racism, and every element was deployed to oppose the constitutional arrangements through which this country's Indigenous people hold shared authority. The structure has been named precisely in the scholarship on colour-blind racism as abstract liberalism, the use of formal equality language to defend a substantively unequal order, and in the scholarship on multiculturalism as national management, where diversity is welcomed on condition that it makes no claim on sovereignty.^{38,39}



Figure 8: Advertising from the We Belong Aotearoa presence. The register is civic and warm, and the policy content is opposition to Te Tiriti-based shared authority.

The erasure operates at two levels and the second is the more serious. At the first level, Māori arguments about Te Tiriti are absent from a campaign about Te Tiriti. At the second level, the migrant communities the campaign addressed were erased in the act of being depicted. Stock photographs were purchased and placed into a claim that none of the people in them was consulted about. Representation was maximised and voice was zero, because the images were commodities acquired on a licensing market and the people in them had no relationship to the campaign whatsoever.



Figure 9: Campaign messaging deploying multicultural imagery in opposition to Te Tiriti-based arrangements. Diversity appears as the warrant for a claim that shared constitutional authority is unfair to the diverse.

There is a specifically colonial move here that should be named. By addressing migrant communities and inviting them into a settler grievance about Māori privilege, the campaign attempted to recruit tangata Tiriti into undermining the very instrument through which their own presence in Aotearoa is legitimated. Te Tiriti is not a Māori entitlement that non-Māori tolerate. It is the constitutional basis on which non-Māori are here at all.⁴⁰ A campaign that persuades migrant New Zealanders to oppose it persuades them to see through the branch they are standing on, in the name of belonging.

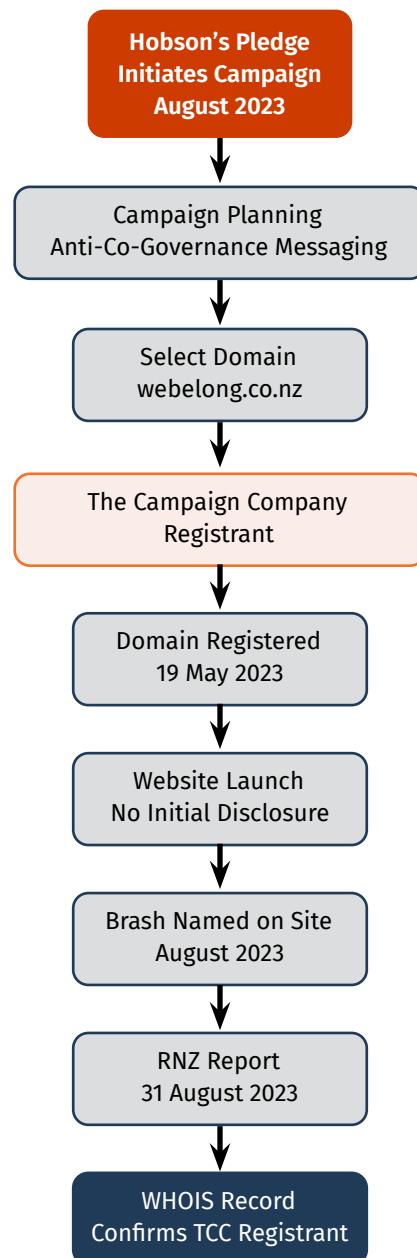


Figure 10: The domain registration chain linking The Campaign Company to the We Belong Aotearoa campaign and to associated Hobson's Pledge properties. Registration records are the residue that concealment leaves behind.

The structural lesson concerns the location of disclosure. When a line naming Don Brash was eventually added, it did not undo the campaign, because everyone who had already encountered the material had encountered it without the disclosure. Disclosure at the foot of a page is not disclosure at the point of reading. The regulatory question this raises is not whether authorship should be disclosed. It is where.

5.3 *Save Our Stores and the first name without a surname, 2023*

The Smokefree Environments and Regulated Products (Smoked Tobacco) Amendment Act 2022 was, when it passed, the most ambitious tobacco control legislation in the world. It combined denicotinisation, a smokefree generation provision, and a reduction in the number of outlets permitted to sell smoked tobacco from around 6,000 to 600 by July 2024. The public health case rested on decades of evidence and the equity case rested on the fact that smoking-related death falls with particular weight on Māori, a pattern the tupeka kore movement had named and organised against for years.^{26,41}

From 1 August 2023 advertisements appeared on Facebook directing users to a site called Save Our Stores and inviting them to sign a petition to repeal the Act. The site presented as an initiative of dairy owners, featuring a Lower Hutt dairy owner introduced only as Bhavesh, who described 17 years of serving customers. In smaller type at the foot of the page the site was described as proudly supported by British American Tobacco New Zealand and Imperial Brands, and its privacy policy stated that the site was provided by those companies. The domain had been created on 28 June 2023 and the registrant name recorded was Campaign Company, at the same Auckland address and contact as the webelong.co.nz record. When RNZ made enquiries about the man identified as Bhavesh, his image was removed from the site.^{25,42}

The advertising content demonstrates the standard repertoire exactly. Some advertisements showed apparent dairy owners with the save our stores message. Others claimed the law would empower gangs, that ram raids would increase if fewer stores stocked cigarettes, and that tobacco tax revenue was sufficient to fund 35,000 police officers.²⁵ New Zealand then employed roughly 11,000 police officers, and tobacco excise is not hypothecated to any purpose but flows into the consolidated fund. Those claims were not marginal embellishments. They were the campaign's principal emotional content, and they attached a public health measure to a wave of retail crime that had genuinely frightened dairy owners, several of whom had been seriously harmed in ram raids.

The inversion is exact. A measure designed to reduce a product that kills thousands of New Zealanders every year was recast as a threat to the safety and livelihood of the people who sell it. The co-option operates on a real and racialised vulnerability, since the corner dairy in this country is disproportionately owned and staffed by migrant families, many of Indian and Chinese descent, who had been the visible victims of a retail crime wave and who received considerably less public sympathy than they deserved. The tobacco industry did not create that vulnerability. It located it and borrowed it.

The erasure is the most complete in the corpus. Absent from a campaign about tobacco retail were the epidemiology, the cessation services, the tupeka kore organisers, the health workers, and above all the dead. Absent too, in a precise and telling way, was Bhavesh. He was given a first name and no surname, a location and no organisation, a livelihood and no policy position beyond the one written for him, and when a journalist sought to speak with him he disappeared from the site. A man was rendered into evidence and then withdrawn when the evidence was tested. Whether he consented to any of it remains unclear on the public record, which is itself the finding: a campaign that hinged entirely on the authenticity of one person's voice left that person's standing indeterminate.

The incoming coalition government repealed the denicotinisation, smokefree generation and retail reduction measures under urgency in early 2024.⁴³ It would overstate the evidence to attribute that repeal to the campaign and I do not. It would be an equal error to treat the campaign as having failed. The circuit does not require the campaign to be the cause. It requires the campaign to have made the repeal sayable, and to have supplied the small business framing through which a concession to two tobacco multinationals could be presented as something else. That is the return on the investment.

5.4 The billboards that wore the other party's clothes, April 2025

In early April 2025 digital billboards appeared in central Wellington carrying photographs of the Green Party member of Parliament Tamatha Paul, and in central Auckland carrying photographs of the party's co-leader Chlöe Swarbrick beside the slogan Defund the Police, with the words Vote Green in a green box. A second version, Whoop Woop! Defund Da Police, referenced a KRS-One track Paul had played during a public DJ set. Defunding police is not Green Party policy. The Green Party complained to the billboard company asserting copyright in Paul's official candidate photograph, and that image was replaced with a candid one; a Swarbrick version used a still of her speaking in Parliament.^{44,45,46}

The Advertising Standards Authority considered eight complaints about six advertisements and upheld them in part on 29 April 2025. Its decision records the authorisation statement carried in small print at the foot of each billboard: authorised by Louise Parsons, The Sensible Sentencing Trust, Unit 6, 24/143 Quay Street, Auckland.⁴⁶ That address corresponds to the registered office of The Campaign Company Limited.¹² Reporting at the time recorded that the Trust had engaged the firm to create the advertising.⁴⁷ The linkage between the promoter of record and the consultancy is therefore not an inference drawn from style or coincidence. It is printed on the advertisement itself and preserved in a published regulatory decision.

The operation differs in kind from the three that precede it, and it marks the escalation. Those campaigns simulated a public that did not exist. This one appropriates a public that does, by wearing its visual identity. The billboard does not pretend to be a grassroots movement. It pretends, for the two or three seconds available to a driver at an intersection, to be the Green Party. The authorisation line is legally sufficient and practically irrelevant, because nobody reads the bottom of a digital billboard at 40 kilometres an hour, and the design ensures they do not need to in order to take a meaning from it. The Electoral Commission, asked by the Green Party to consider the advertisements, took the view that they complied with the Electoral Act.⁴⁸

The inversion converts a deliberative act into a slogan. A member of Parliament had raised a question about whether some functions currently performed by police might sit better with other agencies, which is an ordinary question of public administration asked in many jurisdictions. The campaign attached to that question an imported American phrase carrying a decade of accumulated affect from another country's racial politics, and then attached the phrase to her face. The erasure is of her actual position and, more fundamentally, of her standing to hold one. A representative whose recorded words can be replaced with a slogan of an opponent's choosing has had something taken from her that is prior to the argument.

There is a gendered and racialised dimension the record supports and that should be named. Both targets were young women. The Whoop Woop variant drew on a Black American hip hop reference in order to associate a wahine Māori member of Parliament with a foreign radicalism, a manoeuvre with a long history in settler political communication.⁴⁹ Independent analysis of the networked harms directed at Paul across that week documented the pattern as technology-facilitated gender-based violence against women in politics.⁵⁰ The technique was not simply to misrepresent a policy. It was to render a particular kind of politician unserious.

The structural lesson is the sharpest in this paper. Every legal requirement was met. An authorisation line was present. A third-party promoter was identified. A regulator found the advertisements compliant with electoral law. The only thing the public could not learn from the billboard was the thing that mattered, which is that a commercial firm connected to a lobbying organisation had designed the advertisement to be misread, from an address printed in the small type nobody reads.

5.5 The moko kauae on the billboard, 2025

The Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Act 2024 reinstated a requirement that councils hold binding polls on Māori wards established without one. Forty-two

councils, 37 territorial and five regional, held referendums alongside the local elections between 9 September and 11 October 2025.^{5,51} Hobson's Pledge campaigned nationally for removal. As set out in section 2, the Advertising Standards Authority's decision on the billboard complaints records The Campaign Company as the agency that responded on Hobson's Pledge's behalf, which documents the agency relationship and nothing further.¹⁵

The campaign's conduct is documented in detail because the people it used complained publicly. In August 2025 billboards appeared in Rotorua, Hamilton, Whangārei and Christchurch carrying a photograph of a Māori woman with moko kauae beside the words my mana doesn't need a mandate, vote no to Māori wards. The woman was Ellen Tamati, a Rotorua kuia. She had not consented, learned of it when her whānau phoned her at 20 to two in the morning, and, as her whānau put it publicly, fundamentally disagreed with the message her face was carrying. The photograph had been taken at Waitangi Day celebrations in 2025 by a travel photographer and licensed through iStock and Shutterstock under an editorial use only designation, which excludes advertising and promotional use without a release from the person depicted. The Advertising Standards Authority received 152 complaints between 7.30pm on 5 August and 5.00pm on 7 August. Hobson's Pledge removed the billboards and apologised while maintaining that the image had been legally purchased.^{15,52,53}

The pattern then repeated. Later in August an image and quotations of the Rotorua mayor Tania Tapsell were used in campaign material; she stated publicly that she had given no permission for her image or comments to be used to suggest she supported the campaign. In September the New Plymouth councillor Dinnie Moeahu found his name and photograph used in an advertisement arguing that his own electoral success proved Māori do not need dedicated seats, despite his objection and despite his campaigning to retain the wards. In September Stuff removed a Hobson's Pledge advertisement from its sites after complaints while NZME continued to run the same advertisement, stating that it met the company's criteria for advocacy advertising.^{54,55}

The inversion here is the most audacious in the corpus, because it does not merely erase Māori voice. It ventriloquises it. A campaign to remove Māori representation was conducted through Māori faces, using the word mana, arguing that dignity is a reason to decline a seat at the table. The colonising myth of one people is the founding operation of settler common sense in this country.⁵⁶ This campaign performed that myth in the first person, through people who had not agreed to speak it and who in several cases had campaigned against it. Tamati's own response was to point to her chin and explain what the moko kauae carries, and then to tell the country to go and vote for the wards.⁵²

What that took from her is not captured by the word misuse. A moko kauae is not a design. It records whakapapa, and Tamati described hers as carrying her Te Arawa waka on one side and her Mātaatua waka on the other. Placing it above a slogan against Māori representation conscripted her ancestors into an argument against her descendants. The campaign then defended itself by noting that the image was publicly available on stock platforms, which is an argument that a person becomes usable once a photograph of her has been indexed. That is the logic of the licensing market applied to a human being, and it is the purest statement of the voice ledger this paper describes.

6. THE INVERSION ENGINE

Read together, the five campaigns are five settings of one machine. In each, a protective or corrective measure is recast as an injury, the moral vocabulary of the recasting is borrowed from the tradition the measure belongs to, and a specific set of voices has to disappear for the recasting to hold.

THE INVERSION ENGINE: HOW A PROTECTION BECOMES AN INJURY

The material relation is turned on its head while the moral vocabulary survives intact

THE MATERIAL RELATION	THE INVERSION PERFORMED	WHAT CIRCULATES, AND WHO VANISHES
Freshwater and biodiversity rules Limits on an industry whose effluent enters rivers that other people drink from, swim in and whakapapa to	Regulation recast as urban contempt for rural life ▶ Tractors, dogs and a howl: a culture rather than a balance sheet	Circulates: the farmer as the last person in New Zealand nobody will defend. ▶ Vanishes: kaitiakitanga and the hapū downstream; the farmers who had already paid for compliance
Co-governance under Te Tiriti Shared authority over shared resources, arising from a guarantee given in 1840 and broken repeatedly since	Obligation recast as privilege, under the banner of belonging ▶ Purchased multicultural imagery doing the work of exclusion	Circulates: one law for all, spoken in the warm register of inclusion. ▶ Vanishes: the text of Te Tiriti, and every Māori and migrant voice the images were bought to imply
Smokefree retail reduction Cutting tobacco outlets from about 6,000 to 600, in a country where smoking kills thousands a year	Public health recast as an attack on the migrant shopkeeper ▶ Ram raids, gangs and lost livelihoods standing in for lung cancer	Circulates: a dairy owner called Bhavesh, with no surname, speaking for two multinationals. ▶ Vanishes: the tupeka kore movement, the cessation workers, the epidemiology, and the dead
A question about police budgets A member of Parliament asks whether some police functions might sit better with other agencies	Deliberation recast as a slogan, in the opponent's own colours ▶ An imported American phrase fixed to a New Zealand face	Circulates: a hoarding a driver reads as the Green Party speaking about itself. ▶ Vanishes: the policy she actually holds, and her standing to state it
Māori wards A modest structural correction to more than a century of near-total absence from council tables	Representation recast as separatism, spoken through a Māori face ▶ Moko kauae as the licence for the message that removes her seat	Circulates: mana without a mandate, as though dignity were an argument against a vote. ▶ Vanishes: consent. Those pictured opposed the campaign that used them, and said so publicly

Figure 11: *The inversion engine. In each campaign the material relation is turned on its head while the moral vocabulary is preserved, leaving a circulating meaning and a specific set of erased participants.*

The template has three invariant components. The first is a sympathetic proxy the audience is disposed to protect, occupying a position of genuine vulnerability, because manufactured vulnerability does not persuade. The second is a transfer of moral position, in which the party currently protected by the measure becomes the party threatening the proxy. The third is the removal from the frame of the people the measure was designed to protect, since their presence would restore the original relation. Inversion is more powerful than lying and far harder to correct. A lie can be refuted with a fact. An inversion makes no primary factual claim, so the fact arrives already coded. Once regulation designed to keep effluent out of drinking water has been established as an attack on rural people, every subsequent fact about water quality arrives as an attack. Once a treaty obligation has been established as a racial privilege, every subsequent explanation of the treaty arrives as special pleading.

7. THE VOICE LEDGER: APPEARING WITHOUT SPEAKING

The most consistent finding across the corpus concerns the relation between appearance and voice. These campaigns are, by the standards of representational diversity, remarkable. A Māori man in business clothing. A young woman in a hijab. A migrant dairy owner. A kuia with moko kauae. A Māori mayor. A Māori councillor. Two young women members of Parliament. On a simple audit of who appears, several of these campaigns would score better than the institutions that criticised them.

Every one of those appearances was made without the standing to shape the claim, and in the documented instances of Tamati, Tapsell and Moeahu the person depicted publicly opposed the message their image carried. This is the empirical core of the paper's theoretical contribution. Voice, in the culture-centered account, is not the capacity to speak. It is the capacity to be heard inside a structure built to listen.¹⁰ Representation and voice are therefore not merely distinct. Under conditions of purchasable imagery they can vary inversely, because the diversity of the image is precisely what licenses the claim the campaign makes against the people depicted. The photograph does argumentative work to the exact extent that its subject is silent.

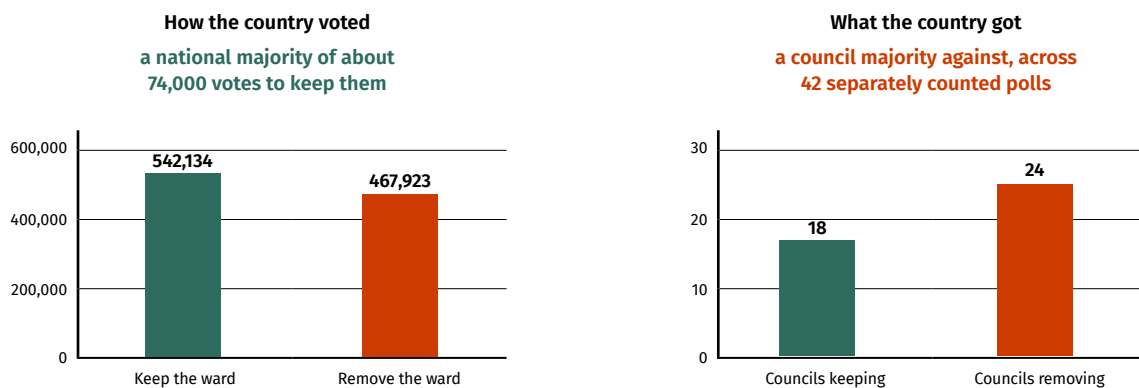
The ledger has three positions and movement between them is not available to the people at the centre. There are those who own the communicative infrastructure, meaning whoever holds the domain, the budget, the targeting parameters and the brief. There are those who appear inside it, meaning faces, first names, moko kauae, dairy counters and tractors. And there are those who are absent from it while its outcomes are applied to their lives: the hapū whose river the rules protected, the whānau of the people who die of smoking each year, the Māori ward councillor unseated by a poll she could not fund. What a voice infrastructure would require instead is not mysterious. Ownership of the platform and the budget by the people affected, including the right to stop the campaign. Consent that is continuous rather than purchased, since a licence from a stock library is not consent from the person in the photograph. Authorship legible at the point of reading. The capacity for those named to contest the claim at comparable reach. And structure on the agenda rather than only culture, so that land, water, tobacco profit and council power are named as the stakes they actually are.

8. THE DISAGGREGATION EFFECT: HOW A NATIONAL MAJORITY LOST

The outcome of the 2025 referendums is where the structural analysis becomes decisive, and it is the finding in this paper with the widest application beyond Aotearoa. Across the 42 councils, on totals compiled from the council declarations, 542,134 votes were cast to keep Māori wards and 467,923 to remove them, a national majority of about 74,000 in favour of retention; because some electors voted in both a regional poll and a city or district poll, these are votes rather than voters.⁵¹ Eighteen councils retained their wards and 24 removed them.^{5,6} Counting Kaipara and Upper Hutt, which had already removed or rescinded wards before the elections, 26 councils have now scrapped them, with Tauranga City Council yet to decide, and the referendum results bind for the 2028 and 2031 elections.⁶

THE DISAGGREGATION EFFECT: THE UNIT OF COUNTING IS A POLITICAL DECISION

Binding Māori ward referendums held alongside the 2025 local elections, final results



Requiring a separate binding poll in every district converted one national question into 42 small ones, several of them decided by a few hundred votes. On the final declarations, Ōtorohanga removed its ward by 121 votes, Horowhenua by 188 and Waikato by 707. In that arithmetic, a modest advertising budget, applied to the lowest margins, purchases an outcome the national vote did not deliver. The design of the counting unit, rather than the persuasiveness of the argument, carried the result, and the result binds until 2031.

Figure 12: The disaggregation effect. A national majority in favour of retaining Māori wards produced a council majority against them, because the unit of counting was designed to make that possible.

Several of the removals were extremely close. On the final declarations, Ōtorohanga removed its ward by 121 votes, Horowhenua by 188 and Waikato by 707.⁵⁷ Meanwhile the urban and rural split was pronounced: of the seven city councils holding referendums, all but one retained, while only 10 of 30 district councils did.⁵⁸ Those two facts together are the whole mechanism. Large majorities in favour were concentrated in the cities, where they could not affect other districts, while in several districts the majority against was small enough that a modest shift decided the result.

The decision that produced that result was taken in Parliament, not in any campaign. Requiring 42 separate binding polls rather than one national question converted an argument that was being lost nationally into 42 local arguments in which a modest advertising budget applied to the narrowest margins could purchase an outcome the country as a whole had rejected. No amount of persuasive counter-speech could have altered that arithmetic, because the arithmetic was never in the domain of speech. There is a further structural asymmetry inside the same design: the referendums were open to all voters in each district rather than to the Māori roll, so the question of whether Māori representation continued was decided by an electorate in which the people most affected were, by construction, a minority.

I name this unit disaggregation and treat it as a technique in its own right, alongside authorship dispersal, proxy recruitment, purchased representation, moral vocabulary capture and identity appropriation. It is the technique against which communication has the least purchase, and it is therefore the one that a culture-centered analysis is best placed to make visible, because the approach insists that structure be examined rather than assumed. An analysis confined to messages would record a campaign that drew 152 complaints, was withdrawn, apologised and was widely condemned, and would call that a defeat. The structural analysis records that the wards were removed at 24 councils and will stay removed until at least 2031, which is what the campaign was for.

9. WHY EXPOSURE HAS NOT WORKED

New Zealand journalism has done this work well. RNZ established the tobacco funding behind Save Our Stores and the company's operation of We Belong Aotearoa. Newsroom traced the Taxpayers' Union's role in the protest domain. The Advertising Standards Authority upheld complaints and published the authorisation line that connects a promoter to an address on Quay Street, and in its decision on the Tamati billboard recorded the agency that responded for Hobson's Pledge. Local Democracy Reporting followed the use of Moeahu's image. Every case in this corpus was exposed, most of them promptly.^{7,14,25,46,55}

The exposure did not restore the position, and the reason follows directly from the circuit. A campaign's product is delivered at the moment of circulation, and circulation is complete before the investigation is published. A repeal argument that has entered the political vocabulary does not leave it when its origin is disclosed. A referendum decided in October is not undecided by an adverse ruling that arrives after the vote. The temporal structure of exposure guarantees that it arrives after the return has been banked.

There is a second and less comfortable effect. Each exposure teaches the public that campaigns of this kind exist, which is necessary, and also teaches it that any campaign might be one, which is corrosive. Once a public learns that tractors in the street may have been organised from a Wellington office, tractors become uninterpretable. That cost falls unevenly. A well-funded actor survives the suspicion by buying reach. A community organisation with no budget cannot. The commons of deliberation is depleted and the depletion is asymmetric, which is why I treat it in the circuit diagram as an externalised cost rather than as an unfortunate side effect.

The regulatory implication is straightforward. Remedies that operate downstream of circulation are mistargeted by design. Intervention has to occur at the point of authorship, at the moment a claim is read, which is what the recommendations below are built around.

10. RECOMMENDATIONS

These are ordered by the point in the circuit at which they intervene. The measures addressed to authorship are the load-bearing ones. None of them restricts anyone's speech. They restrict only the capacity to speak while appearing to be somebody else.

Authorship and disclosure

1. Require every political and issue advertisement, in any medium, to display at the point of encounter the name of the party that paid for it and the name of any agency that produced it. Disclosure in fine print at the foot of a digital billboard is not disclosure, because it is not read at the moment the meaning is taken.
2. Extend the definition of an election advertisement to cover issue advertising conducted outside the regulated period where it names or depicts a candidate, a party or a constitutionally protected group, and apply the same authorship disclosure to it.
3. Establish a statutory register of political campaign service providers, requiring firms that supply campaign creative, targeting, domain administration or media buying for political or issue campaigns to register and to file, quarterly, the identity of each client and the campaigns undertaken.
4. Require that domain registration for any political or issue campaign identify the beneficial client rather than the servicing agency, with the record public and non-redactable for the duration of the campaign.

Money

5. Lower the third-party promoter expense declaration threshold substantially below one hundred thousand dollars, so that the majority of registered promoters file rather than the small minority that do at present.
6. Require real-time reporting of third-party campaign expenditure during the regulated period, so that the public learns the shape of a campaign while it can still respond to it.
7. Close the attack advertising gap by bringing advertising that names or depicts a candidate or party within the relevant spending caps, whether or not it can reasonably be regarded as encouraging a vote.
8. Extend electoral finance disclosure to local government campaigns and to binding local referendums, which at present sit almost entirely outside the regime while deciding questions of constitutional significance.
9. Reverse the Electoral Amendment Act, 2025's increase in the threshold above which a donor must be named, lower that threshold, and institute a cap per donor per electoral cycle.

Images, consent and standards

10. Prohibit the use in political or issue advertising of the image of an identifiable person without that person's specific, documented and revocable consent to the use of their image in connection with the position advanced. Stock library licensing should be explicitly insufficient for this purpose, and the editorial use only designation should be recognised in New Zealand law as excluding political advertising.
11. Give the Advertising Standards Authority power to require immediate withdrawal of an advertisement pending determination where a prima facie case of non-consensual use of an identifiable person's image is established, and to require corrective advertising of comparable reach and placement where a complaint is upheld.
12. Recognise in the standards framework that the non-consensual use of Māori individuals' images, and of moko kauae in particular, in campaigns opposing Māori rights constitutes a distinct and aggravated harm, and develop the assessment of that harm with iwi and Māori organisations rather than for them.

Counting units and constitutional questions

13. Require that any proposal to decide a question of Tiriti-based representation by referendum specify, and justify in the explanatory material, the unit at which votes will be counted, on the basis that the choice of unit is a substantive decision about the outcome rather than a procedural detail.
14. Restore the position in which councils may establish Māori wards by resolution, as they may establish every other kind of ward, and remove the asymmetry under which only Māori representation requires a binding poll of an electorate in which Māori are a minority.

Platforms, media and community infrastructure

15. Require platforms carrying political advertising in New Zealand to disclose exact spend rather than banded ranges, together with targeting parameters and the identity of the paying entity, in a machine-readable public archive retained for at least seven years.
16. Establish an industry standard under which news organisations decline political advertising that does not identify both funder and producing agency, following the publishers that have already withdrawn advertising on such grounds.
17. Fund independent public-interest capacity for continuous monitoring of campaign infrastructure, including registration records and advertising archives, so that authorship is established during campaigns rather than after them.

Regulation alone will not restore what these campaigns take. Voice is a property of infrastructure, and infrastructure has to be built and held by communities themselves. In practical terms that means sustained investment in community-owned communicative capacity: iwi and hapū media, migrant community media, public health advocacy organisations resourced to answer at comparable scale, and community advisory structures with real authority over the framing of any campaign conducted in their name. It also means that researchers and universities carry an obligation here that publication does not discharge. Mapping the infrastructure, as this paper attempts, is one contribution. Placing the map in the hands of the communities these campaigns act upon is the more important one.

11. CONCLUSION

The firm's name is on the glass at Quay Street, in letters you can read from the boardwalk. Nothing about that is concealed and nothing needs to be. What the five campaigns in this paper share is that the name never travelled with the work. A protest domain moved registrant when somebody asked. A website about belonging carried no mark until a journalist supplied one. A petition to save the corner dairy named its tobacco backers in type most people would not read. An authorisation line printed an address in a font sized to be ignored. And in the last case the agency's name entered the public record through a regulator's decision on the complaints.

Between 2021 and 2025 that arrangement produced results. Tobacco control measures that had been the most ambitious in the world were repealed. A question about police budgets was converted into a slogan in the opposing party's own colours, and a regulator found the conversion lawful. And twenty-four councils removed Māori wards in a country where more votes were cast to keep them than to remove them, an outcome that will stand until 2031. When the borrowed faces belonged to Māori who had not consented and who publicly opposed the message, the operation reached its clearest form: a campaign to remove Indigenous representation, conducted through Indigenous faces, defended on the ground that the photographs had been lawfully licensed.

The remedies are not technically difficult. Authorship should be legible where a claim is read. Money should be declared while it is being spent. A person's face should not be usable to argue for something they oppose, and a stock licence should not be a substitute for their consent. Local referendums that decide constitutional questions should carry the same disclosure as national elections, and the choice of counting unit should be argued in the open as the substantive decision it is.

What the culture-centered approach adds to that list is the insistence that regulation is the floor and not the ceiling. The deeper task is the construction of communicative infrastructure owned by the communities at the margins, so that the answer to a manufactured public is an actual one. Ellen Tamati, asked how she felt about a billboard bearing her face and a message she opposed, pointed to her chin, named the two waka her moko kauae carries, and told the country to go and vote for the wards. She had no budget, no agency and no domain. She had whakapapa and she had a reporter in the room. Voice is built, held and defended, or it is bought by somebody else and used against the people it was taken from.

APPENDIX A: LINKAGE REGISTER

The table records each linkage relied on in this paper against its evidentiary class. Documented claims rest on an inspectable primary record; reported claims rest on named journalism; analytic inferences are mine.

LINKAGE	CLASS	BASIS
The Campaign Company Limited incorporated 4 November 2021, company number 8257633, business classification public affairs consultant service; Jordan Williams founder and chief executive, sole director until January 2026; registered office Unit 6, 143 Quay Street, Auckland Central	Documented	Companies Office register; Lobbying and Influence Register entry compiling it, notes 1 and 2
Williams is executive director of the Taxpayers' Union and a co-founder of the Free Speech Union; Ani O'Brien is general manager of the company	Documented	Organisations' own published material; RNZ interview, 2024; note 2
Williams attended Atlas Network training in 2015 and was profiled by Atlas as a Smith Fellowship alumnus in 2018; Atlas funding never exceeded one to two percent of Taxpayers' Union income on his own account	Documented and reported	Atlas Network's own 2015 participant list and 2018 fellow profile, note 16; Newsroom, 31 October 2023
motherofallprotests.nz created 14 November 2021; registrant recorded as Groundswell NZ by March 2024	Documented	.nz query service record captured 5 March 2024
The domain was registered first to the Taxpayers' Union, then updated to The Campaign Company	Reported	Contemporaneous screenshots; Newsroom, 31 October 2023
Groundswell used the Taxpayers' Union's digital contractor, on the Union's referral, and the company paid for NZ Herald sponsored content presenting its Groundswell work	Reported and self-disclosed	Founders' own account on The Country, November 2021, and NZ Herald sponsored content, July 2022, both as reported by Torrin, note 4
webelong.co.nz registrant recorded as Campaign Company, registered 19 May 2023; the site was created by Hobson's Pledge	Documented and reported	.nz query service record captured 2 March 2024; RNZ, 31 August 2023
The company listed as registrant or administrative contact for isthisracist.nz, equalhealth.nz, bottomline.nz and Hobson's Pledge domains	Reported	RNZ, 31 August 2023; Astrourfing NZ, March 2024
saveourstores.nz created and registered to Campaign Company 28 June 2023; campaign run for BAT New Zealand and Imperial Brands	Documented and reported	.nz query service record captured 1 March 2024; the site's own footer and privacy policy; RNZ, August 2023
The April 2025 billboards carried the authorisation line of Louise Parsons, The Sensible Sentencing Trust, Unit 6, 24/143 Quay Street, Auckland, which corresponds to the registered office of The Campaign Company	Documented	Advertising Standards Authority decision 25/043, 29 April 2025, reproducing the authorisation statement; Companies Office register
The Sensible Sentencing Trust engaged the company to create the April 2025 billboard advertising	Documented and reported	Andrea Vance, The Post, 11 April 2025; ASA decision 25/043, Appendix 2, where the advertiser states that The Campaign Company was acting on its behalf
The Electoral Commission considered the April 2025 billboards compliant with the Electoral Act	Reported	RNZ, 7 April 2025, reporting the Commission's response to the Green Party
Declared third-party promoter spending rose from about \$147,000 in 2020 to about \$1.95 million in 2023; 25 of 32 registered promoters filed no expense return	Documented	Electoral Commission registered promoter returns; RNZ, 26 February 2024
Hobson's Pledge used images of Ellen Tamati, Tania Tapsell and Dinnie Moeahu in the 2025 wards campaign without their consent; the Tamati image was licensed for editorial use only	Documented and reported	Statements by those depicted; ASA decision 25/143 (152 complaints); RNZ, 1News, NZ Herald and Local Democracy Reporting, August and September 2025

LINKAGE	CLASS	BASIS
Forty-two councils held referendums in 2025; 18 retained and 24 removed their wards; 542,134 votes to keep and 467,923 to remove	Documented	Council referendum declarations and compiled final results; RNZ, October 2025
The Campaign Company responded to the Advertising Standards Authority as the agency for Hobson's Pledge's 2025 billboard against Māori wards	Documented	Advertising Standards Authority decision 25/143, 26 August 2025, note 15. The decision does not record who designed the creative, and that claim is not made here

APPENDIX B: IMAGES, PROVENANCE AND USE

Twelve figures appear in this paper. Figure 1 is my own photograph, taken on 12 January 2025 from the publicly accessible walkway outside the premises at 143 Quay Street, Auckland. Photographing a building from a public place is lawful in New Zealand, and section 73 of the Copyright Act 1994 provides that copyright in a building permanently situated in a public place is not infringed by photographing it or by publishing the photograph.⁵⁹ No identifiable person appears in the frame. The file's location metadata has been stripped before publication. A small placard is visible on the interior wall behind the window signage; three characters are partially legible and the word is not, so I make no claim about it and have said so in the caption. I took a second photograph on the same evening, of a bookshelf visible through a window. I have not published it. Photographing the interior contents of an office through glass sits outside the protection that section 73 gives to the building itself, the evidentiary value of a bookshelf is negligible, and a paper whose authority rests on evidentiary discipline should not spend that authority on its weakest exhibit. The photograph belongs to a longer programme of fieldwork in public space, and the method, its place in the culture-centered approach and the ethical constraints under which I conduct it are set out in full at note 60.

Figures 2, 3, 4, 10, 11 and 12 are my own analytical constructions, built from the records cited in the endnotes. Figure 4 draws on Electoral Commission returns and Elections New Zealand guidance; Figure 12 draws on council referendum declarations and compiled final results. Figures 5 to 9 are screenshots of campaign material published by Groundswell NZ, We Belong Aotearoa and associated campaigns on their own public websites and social media accounts, supplied to me in that form. I have not altered any of them. Where I have not been able to retrieve a post at its original address, the screenshot is treated as the record of what was published rather than as a link a reader can follow, and every factual claim drawn from it is corroborated in the text by a separately cited report.

All are reproduced for the purposes of criticism, review and reporting of current events, and each is analysed in the body of the paper rather than used decoratively. I have deliberately not reproduced the billboard bearing Ellen Tamati's photograph. The argument about it is fully carried by her own published words and by the reporting cited, and reproducing an image whose entire injury consists in its circulation without her consent would repeat that injury in order to describe it. Where a campaign has made a numerical claim about itself, I attribute the figure to the campaign and say so.

APPENDIX C: REFERENCES

All references were checked against the record named in each entry in October 2026. Where an entry rests on journalism, the outlet, the date and, where a byline is available, the reporter are given. Where it rests on a primary record, the record is named so that any reader can retrieve it independently. Where a claim rests on scholarship, the work is cited in full.

1. New Zealand Companies Office, register entry for The Campaign Company Limited, company number 8257633, NZBN 9429050044078, <https://app.companiesoffice.govt.nz/co/8257633>, retrieved 8 October 2026: incorporated 4 November 2021; industry classification M696275, public affairs consultant service; registered office Unit 6, 143 Quay Street, Auckland Central, Auckland 1010; 1,000 shares, of which 980 are held jointly by Bermuda Corporate Trustee Limited, Emily Elizabeth Hughes and Jordan Henry Williams, and 10 each by Williams and Hughes; directors Jordan Henry Williams, appointed 4 November 2021, and Emily Elizabeth Hughes, appointed 1 January 2026 by a notice registered on 7 September 2026. The annual returns filed on 7 April 2025 and 6 April 2026 record the same shareholding, with Williams as sole director.
2. Bryce Edwards, "The Campaign Company," entry in the New Zealand Lobbying and Influence Register, The Democracy Project, updated 22 May 2025, <https://www.democracyproject.org.nz/p/the-campaign-company>, recording Williams as founder, owner and chief executive, Ani O'Brien as general manager; manager, and approximately seven staff as of 2023.
3. Guyon Espiner, interview with Jordan Williams, 30 with Guyon Espiner, RNZ, May 2024, <https://www.rnz.co.nz/programmes/30-with-guyon-espiner/story/2018938627/jordan-williams-on-what-the-taxpayers-union-really-is-and-who-funds-it>. Free Speech Union, "About," <https://www.fsu.nz/about>, listing Williams on its council as a co-founder.
4. Gustaf Torrin, "The Campaign Company: Astroturfing for Fun and Profit," Astroturfing NZ, 6 March 2024, <https://www.astroturfing.nz/the-campaign-company-astroturfing-for-fun-and-profit/>. This compilation collates the underlying domain registration records, electoral returns and news reporting, each of which is cited separately below where relied on. On the Sensible Sentencing Trust engagement in April 2025, see notes 46 and 47.
5. Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Act 2024, Public Act 2024 No 28, Royal assent 30 July 2024, <https://www.legislation.govt.nz/act/public/2024/28/en/latest/>; referendums held in 37 territorial and 5 regional council areas between 9 September and 11 October 2025.
6. RNZ, "Final Results Confirm Axeing of More than Half of Māori Wards," 21 October 2025, <https://www.rnz.co.nz/news/political/576556/final-results-confirm-axeing-of-more-than-half-of-maori-wards>, recording 18 councils retaining and 24 removing their wards, and 26 removals in total counting Kaipara and Upper Hutt. See also Daniel Perese and Anastasia Manza, "Local Elections 2025: Final Results Confirm Majority of Councils Reject Māori Wards," 18 October 2025, <https://www.teaonews.co.nz/2025/10/18/local-elections-2025-final-results-confirm-majority-of-councils-reject-maori-wards/>. Te Ao Māori News, 17 October 2025, <https://www.teaonews.co.nz/2025/10/18/local-elections-2025-final-results-confirm-majority-of-councils-reject-maori-wards/>, which records Tauranga City Council as yet to decide. National vote totals are compiled from the council declarations; see note 51.
7. .nz query service record for motherofallprotests.nz, captured 5 March 2024, <https://www.astroturfing.nz/wp-content/uploads/2024/03/motherofallprotests-dns.pdf>. Fields relied on: domain created and registered 14 November 2021; registrant name Groundswell NZ, Gore. The earlier registrant entries for the Taxpayers' Union and The Campaign Company are documented in contemporaneous screenshots and in Newsroom's reporting, note 8. The full sequence of registrants is also set out in Torrin, note 4.
8. David Williams, "Chiding in Plain Sight," Newsroom, 31 October 2023, <https://newsroom.co.nz/2023/10/31/chiding-in-plain-sight/>.
9. Mohan J. Dutta, *Communicating Health: A Culture-Centered Approach* (Cambridge: Polity Press, 2008); Mohan J. Dutta, *Communicating Social Change: Structure, Culture, and Agency* (New York: Routledge, 2011); Mohan J. Dutta, *Communication, Culture and Social Change: Meaning, Co-option and Resistance* (Cham: Palgrave Macmillan, 2020).
10. Nick Couldry, *Why Voice Matters: Culture and Politics after Neoliberalism* (London: Sage, 2010); Mohan J. Dutta and Mahuya Pal, "Theorizing from the Global South: Dismantling, Resisting, and Transforming Communication Theory," *Communication Theory* 30, no. 4 (2020): 349–369.
11. On communicative inversion see Dutta, *Communication, Culture and Social Change*; on the wider mechanism see Stuart Hall, Chas Critcher, Tony Jefferson, John Clarke and Brian Roberts, *Policing the Crisis: Mugging, the State, and Law and Order* (London: Macmillan, 1978), and Edward S. Herman and Noam Chomsky, *Manufacturing Consent: The Political Economy of the Mass Media* (New York: Pantheon, 1988).

12. Patrick Wolfe, "Settler Colonialism and the Elimination of the Native," *Journal of Genocide Research* 8, no. 4 (2006): 387–409; Linda Tuhiwai Smith, *Decolonizing Methodologies: Research and Indigenous Peoples*, 3rd ed. (London: Zed Books, 2021).
13. .nz query service record for webelongs.co.nz, captured 2 March 2024, <https://www.astroturfing.nz/wp-content/uploads/2024/03/webelongs-dns.pdf>. Fields relied on: registrant name Campaign Company; registrant city Auckland; domain registered 19 May 2023; registrar Dreamscape Networks International Pte Ltd trading as Crazy Domains.
14. Farah Hancock, "Astroturf Accusations over We Belong Website Run by Anti Co-Governance Group," RNZ, 31 August 2023, <https://www.rnz.co.nz/news/in-depth/496933/astroturf-accusations-over-we-belong-website-run-by-anti-co-governance-group>. The report records that the website and social media were run by The Campaign Company, the platform advertising figures, the stock photographs, Don Brash's statements to RNZ, and the domain registrations for isthisracist.nz, bottomline.nz, equalhealth.nz and hobsonspledge.nz.
15. Kelly Makiha, "Hobson's Pledge Use of Rotorua Kuia's Image: Whānau Consider Legal Options," *New Zealand Herald / Rotorua Daily Post*, 7 August 2025, <https://www.nzherald.co.nz/rotorua-daily-post/news/hobsons-pledge-use-of-rotorua-kuias-image-whanau-consider-legal-options/MUV6XWRKBCKBJAPWCDJ3A55M/>, recording the provenance of the photograph and lawyer Tania Waikato's assessment of the editorial use only licence conditions; Kelly Makiha and Brodie Stone, "Family Outraged as Kuia's Image Used on Hobson's Pledge Billboard without Consent," *Rotorua Daily Post*, 6 August 2025, <https://www.nzherald.co.nz/rotorua-daily-post/news/rotorua-kuias-image-used-in-hobsons-pledge-billboard-without-consent-family-outraged/2HXYXJL2BJE4XFVJKXPKE7SXFML/>, recording the 1.40am phone call and the whānau's statement that she fundamentally disagrees with the message; Liam Rātana, "How Did Ellen Tamati's Face End Up on Hobson's Pledge Billboards?," *The Spinoff*, 6 August 2025, <https://thespinoff.co.nz/atea/06-08-2025/how-did-ellen-tamatis-face-end-up-on-hobsons-pledge-billboards>, recording Hobson's Pledge's apology and its statement that the image was legally purchased; Advertising Standards Authority, decision 25/143, Hobson's Pledge Trust, Out of Home, 26 August 2025, Settled, <https://asa.co.nz/decision/25-143-hobsons-pledge-trust-out-of-home/>, recording 152 complaints received between 7.30pm on 5 August and 5.00pm on 7 August 2025, the withdrawal of the campaign on 6 August, and the response of "the Agency, The Campaign Company, on behalf of the Advertiser, Hobson's Pledge Trust."
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17. David Williams, "Chiding in Plain Sight," *Newsroom*, 31 October 2023. Williams is quoted there stating that Atlas prize money and other Atlas funding had never constituted more than one or two percent of the Taxpayers' Union's annual income and was its only overseas funding.
18. Auckland Ratepayers' Alliance, incorporated 2015 and directed by Williams, folded into the Taxpayers' Union in 2021; Companies Office register, company number 5728727.
19. Vincent Mosco, *The Political Economy of Communication*, 2nd ed. (London: Sage, 2009); David Miller and William Dinan, *A Century of Spin: How Public Relations Became the Cutting Edge of Corporate Power* (London: Pluto Press, 2008).
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21. Edward T. Walker, *Grassroots for Hire: Public Affairs Consultants in American Democracy* (Cambridge: Cambridge University Press, 2014).
22. Dorie E. Apollonio and Lisa A. Bero, "The Creation of Industry Front Groups: The Tobacco Industry and 'Get Government off Our Back,'" *American Journal of Public Health* 97, no. 3 (2007): 419–427.
23. Amanda Fallin, Rachel Grana and Stanton A. Glantz, "'To Quarterback behind the Scenes, Third-Party Efforts': The Tobacco Industry and the Tea Party," *Tobacco Control* 23, no. 4 (2014): 322–331.
24. Selda Ulucanlar, Gary J. Fooks and Anna B. Gilmore, "The Policy Dystopia Model: An Interpretive Analysis of Tobacco Industry Political Activity," *PLOS Medicine* 13, no. 9 (2016): e1002125; Emily Savell, Anna B. Gilmore and Gary Fooks, "How Does the Tobacco Industry Attempt to Influence Marketing Regulations? A Systematic Review," *PLOS ONE* 9, no. 2 (2014): e87389.
25. RNZ, "The 'Corner Dairy Campaign' Quietly Backed by Big Tobacco," 7 August 2023, <https://www.rnz.co.nz/news/indepth/495271/the-corner-dairy-campaign-quietly-backed-by-big-tobacco>. On the 2008 British campaign, Tobacco Tactics, "Tobacco Retailers' Alliance," University of Bath, <https://www.tobaccotactics.org/article/tobacco-retailers-alliance/>, documenting the Save Our

- Shops campaign run by the Tobacco Retailers' Alliance, which is funded by the Tobacco Manufacturers' Association.
26. Smokefree Environments and Regulated Products (Smoked Tobacco) Amendment Act 2022, Royal assent 16 December 2022, providing for denicotinisation, a smokefree generation and a reduction in retail outlets from approximately 6,000 to 600 by July 2024.
 27. Marie-Laure Djelic and Reza Mousavi, "How the Neoliberal Think Tank Went Global: The Atlas Network, 1981 to the Present," in *Nine Lives of Neoliberalism*, ed. Dieter Plehwe, Quinn Slobodian and Philip Mirowski (London: Verso, 2020), 257–282.
 28. Philip Mirowski and Dieter Plehwe, eds., *The Road from Mont Pèlerin: The Making of the Neoliberal Thought Collective* (Cambridge, MA: Harvard University Press, 2009); Quinn Slobodian, *Globalists: The End of Empire and the Birth of Neoliberalism* (Cambridge, MA: Harvard University Press, 2018).
 29. Electoral Commission, "For Third Party Promoters," <https://elections.nz/guidance-and-rules/for-third-party-promoters>. Promoters spending more than \$100,000 in the regulated period must file an expense return; for the 2026 general election the unregistered limit is \$17,000 and the registered limit \$424,000, within a regulated period of 13 weeks. A promoter that spends, or intends to spend, more than the unregistered limit must register.
 30. Farah Hancock, "\$2m Surge in Election Campaign Spending by Third-Party Groups," RNZ, 26 February 2024, <https://www.rnz.co.nz/news/in-depth/510208/2m-surge-in-election-campaign-spending-by-third-party-groups>; Electoral Commission, "Registered Promoter Expenses for the 2023 General Election," <https://elections.nz/democracy-in-nz/historical-events/2023-general-election/registered-promoter-expenses-for-the-2023-general-election/>.
 31. Bryce Edwards, "NZ Elections Are Being Americanised with Dark Money Flowing into Campaign Groups," The Democracy Project, 26 February 2024, <https://www.democracyproject.org.nz/p/nz-elections-are-being-americanised>, recording the 2020 third party total of about \$147,000 from the same Electoral Commission returns.
 32. Electoral Amendment Act 2025, Public Act 2025 No 82, Royal assent 19 December 2025, <https://www.legislation.govt.nz/act/public/2025/82/en/latest/>: enrolment closes 13 days before polling day; prisoners sentenced for offences committed after commencement are disqualified from voting; the threshold for disclosing a donor's identity rises from \$5,000 to \$6,000. Summarised in Ministry of Justice, "Electoral Law Changes," <https://www.justice.govt.nz/about/news-and-media/news/electoral-law-changes/>.
 33. RNZ Mediawatch, presented by Colin Peacock, "Just Fed-Up Farmers? Or 'Radical Right in Gumboots'?", 28 November 2021, <https://www.rnz.co.nz/national/programmes/mediawatch/audio/2018822169/just-fed-up-farmers-or-radical-right-in-gumboots>. On the Gore protest, Sandy Eggleston, Otago Daily Times, 8 October 2020, <https://www.odt.co.nz/star-news/star-national/they-cant-put-us-all-jail-farmers-drive-tractors-through-gore-protest-water>.
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 35. Bryce McKenzie and Laurie Paterson, interview on The Country, November 2021, as reported in Torrin, note 4.
 36. "How to Build a Force for Good," sponsored content paid for by The Campaign Company, New Zealand Herald, July 2022, <https://www.nzherald.co.nz/sponsored-stories/how-to-build-a-force-for-good/ENHBBPVCTFMFFCIKPUETCF3IZM/>. The July 2022 date and the payment are as reported in Torrin, note 4; the page itself carries neither.
 37. Domain registration records for webelongs.co.nz, hobsonspledge.co.nz, isthisracist.nz, equalhealth.nz and bottomline.nz, as recorded in Torrin, "The Campaign Company," March 2024.
 38. Eduardo Bonilla-Silva, *Racism without Racists: Color-Blind Racism and the Persistence of Racial Inequality in America*, 5th ed. (Lanham: Rowman & Littlefield, 2018).
 39. Ghassan Hage, *White Nation: Fantasies of White Supremacy in a Multicultural Society* (Annandale, NSW: Pluto Press, 1998); Sara Ahmed, *On Being Included: Racism and Diversity in Institutional Life* (Durham: Duke University Press, 2012).
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 41. Papaarangi Reid and Bridget Robson, "Understanding Health Inequities," in *Hauora: Māori Standards of Health IV*, ed. Bridget Robson and Ricci Harris (Wellington: Te Rōpū Rangahau Hauora a Eru Pōmare, 2007), 3–10.
 42. .nz query service record for saveourstores.nz, captured 1 March 2024, <https://www.astroturfing.nz/wp-content/uploads/2024/03/saveourstores-dns.pdf>. Fields relied on: registrant name Campaign Company, with the same Auckland address and contact as the webelongs.co.nz record; domain created and registered 28 June 2023.
 43. Smokefree Environments and Regulated Products Amendment Act 2024, Public Act 2024 No 6, Royal assent 5 March 2024, repealing the denicotinisation, smokefree generation and retail reduction provisions.
 44. RNZ, "Billboards Attacking Green MPs Appear in Wellington and Auckland," 7 April 2025, <https://www.rnz.co.nz/news/>

- [political/557433/billboards-attacking-green-mps-appear-in-wellington-and-auckland.](https://www.nzherald.co.nz/political/557433/billboards-attacking-green-mps-appear-in-wellington-and-auckland/)
45. Adam Pearce, "Copyright Breach Claim Forces Change to Billboards Attacking Green Co-Leader, MP," New Zealand Herald, 7 April 2025 (headline as later updated), <https://www.nzherald.co.nz/nz/politics/billboards-attacking-green-mps-chloe-swarbrick-and-tamatha-paul-appear-in-auckland-wellington/R5TXGHP56RGX3LFS25PAIL3Z2Q/>.
 46. Advertising Standards Authority, decision 25/043, Sensible Sentencing Trust, Out of Home, meeting of 29 April 2025, outcome upheld in part, <https://asa.co.nz/decision/25-043-sensible-sentencing-trust-out-of-home/>; full decision at <https://asa.co.nz/wp-content/uploads/2025/05/25043.pdf>. The decision describes the six advertisements and reproduces the eight complaints, the advertiser's response, the LUMO billboard sites, the campaign period to 20 April 2025, and the promoter's statement "Authorised by Louise Parsons, The Sensible Sentencing Trust, Unit 6, 24/143 Quay Street, Auckland, 1010." The advertiser's response states that The Campaign Company was acting on behalf of Louise Parsons and The Sensible Sentencing Trust.
 47. Andrea Vance, "Firm Owned by Taxpayers' Union Boss behind Green Party Attack Billboards," The Post, 11 April 2025, <https://www.thepost.co.nz/politics/360650922/firm-owned-taxpayers-union-boss-behind-green-party-attack-billboards>; and the advertiser's statement to the Advertising Standards Authority at Appendix 2 of decision 25/043, note 46.
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 50. Sanjana Hattotuwa, "The Targeting of MP Tamatha Paul: Rapid Assessment of Hate, and Harms," 8 April 2025, <https://sanjanah.wordpress.com/2025/04/08/the-targeting-of-mp-tamatha-paul-rapid-assessment-of-hate-and-harms/>.
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 52. 1News, "Kuia Devastated over Use of Her Image on Anti-Māori Ward Billboards," 6 August 2025, <https://www.1news.co.nz/2025/08/06/kuia-devastated-over-use-of-her-image-on-anti-Māori-ward-billboards/>, recording Ellen Tamati's account, her statement about the two waka her moko kauae carries, her call to vote for the wards, and Don Brash's response.
 53. RNZ, "Rotorua Kuia Caught Up in Hobson's Pledge's Anti-Māori Ward Campaign," 6 August 2025, <https://www.rnz.co.nz/news/national/569189/rotorua-kuia-caught-up-in-hobson-s-pledge-s-anti-Māori-ward-campaign>, recording the billboard locations, the more than 30 complaints received by the Advertising Standards Authority as at 10.45am that day, and the editorial use only designation on the iStock image.
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 58. Newsroom, "Urban-Rural Split on Māori Wards as Advocates Eye Next Election," 13 October 2025, <https://newsroom.co.nz/2025/10/13/urban-rural-split-on-Māori-wards-as-advocates-eye-next-election/>, recording that of the seven city councils holding referendums all but one retained their ward, while nine of 29 district councils did.

59. Copyright Act 1994, section 73, <https://www.legislation.govt.nz/act/public/1994/0143/latest/DLM346215.html>.
60. Photograph by the author, 12 January 2025. On method: the image belongs to a continuing programme of ethnographic fieldwork in public space that I have been conducting since 2018, in which I walk, observe and photograph the material infrastructure through which far-right and astroturf political formations operate in Aotearoa New Zealand. The register assembled by that work includes commercial premises and their signage, billboards and hoardings, the halls and venues in which meetings are held, posters and stickers in streets and on campuses, the staging of rallies, and the physical traces that campaigns leave in the built environment. The rationale is methodological before it is evidentiary. Formations of this kind are ordinarily studied through their texts, meaning their websites, posts, press releases and advertisements, and those texts are precisely the artefacts that have been engineered to be read in a particular way. A building will not cooperate in that fashion. The material form of an organisation records what its discourse is designed to disperse: that a movement has an address, a lease, a staff, a registered office and a landlord, and that somebody paid for all of it. In the terms of the culture-centered approach, structure is not an abstraction to be inferred from language. It is a set of arrangements that occupy space, and looking at that space is a way of holding an analysis to the material world rather than to the self-description of the people being analysed. On ethics and public interest: I treat lawfulness as necessary and not sufficient. Photographing a building from a public place is lawful here, and section 73 of the Copyright Act 1994 removes any question of infringing copyright in the architecture itself, while the Privacy Act 2020 governs the purpose and means of collecting personal information and the tort recognised in *Hosking v Runting* [2005] 1 NZLR 1 (CA) protects against publication of private facts where a reasonable expectation of privacy exists. A signed commercial frontage on a public boardwalk, recorded as a registered office on a public register, engages none of those protections. Beyond that legal floor I work to a protocol, and I state it so that readers can hold this work to it. I photograph only from publicly accessible ground and never enter private land, forecourts or lobbies. I photograph organisations and their infrastructure rather than individuals: no faces, no photographing of people entering or leaving premises, and no publication of a frame in which any person is identifiable. I do not photograph interiors, because the exterior of a building and the contents of a room are different objects morally as well as legally, which is why the second photograph taken on this visit has been withheld. I do not return repeatedly to the same premises, since sustained attention directed at a place where identifiable people work becomes a course of conduct rather than an observation. I never photograph or publish anybody's home, including where a residential address appears on a public register. I strip embedded location metadata before publication, because publishing coordinates is a separate act from publishing an image. I publish an image only where it does analytic work in the argument, never as decoration or atmosphere. Wherever possible I corroborate the image against an independent record, as here, where the premises correspond to the registered office recorded for the company at the Companies Office. And I declare what I took, when, from where, and what I chose not to publish. The public interest justification is specific rather than general. The subject is a company incorporated to conduct public affairs consultancy, operating in the political sphere on constitutional questions, whose commercial value to its clients consists in making authorship illegible at the point where a citizen encounters a campaign. Documenting the material existence of such an organisation is accountability of political communication infrastructure, and it reveals nothing that is private: the address is already on a public register, and the photograph adds only the ordinary fact that the register describes something real. I record the asymmetry plainly. Researchers who document these formations are themselves surveilled, photographed and named by them, and a visual register is in part a defensive archive kept by people who expect to be misdescribed. That asymmetry does not license reciprocal intrusion, and the protocol above exists precisely so that it does not become one. The fieldwork involves no human participants, collects no personal information and takes place entirely in public space, so it falls outside the scope of human participant ethics review; the constraints set out here are applied regardless, because a structure that operates by remaining unmapped is answered by mapping it, and mapping carries obligations of its own.