INSTITUTIONAL INTEGRITY AND REGULATORY ACCOUNTABILITY

Deep research report on capture, revolving doors, serial consolidation, nonenforcement, public integrity, and systemic liberty impairment

Area 4 of the Private Infrastructure, Public Power legal framework

Research current through July 19, 2026

This report is a policy and legislative research document, not legal advice. It distinguishes criminal corruption, ethics violations, administrative failure, and proposed institutional reforms.

Executive Summary

Area 4 addresses a gap that remains after the first three reports. Statute 1 regulates private infrastructure that extends public power. GISA regulates government information stewardship. Area 3 defines practical-liberty impairments inside essential private systems. Area 4 asks why government created, preserved, ignored, or failed to correct those conditions and what accountability should follow.

Existing federal law strongly punishes explicit corruption and intentional rights deprivation. Bribery law reaches quid pro quo exchanges involving official acts. Conflict-of-interest law bars executive officials from participating personally and substantially in matters affecting specified financial interests. Post-employment law restricts certain representational contacts after public service. Sections 241 and 242 criminalize conspiracies against federal rights and willful rights deprivation under color of law. Procurement-integrity rules regulate disclosure, negotiations, and improper access to procurement information. [1]-[8]

Those laws leave a substantial middle zone. Regulatory capture may occur through repeated access, informational dependence, cultural identification, future employment incentives, serial waivers, weak documentation, or policy processes dominated by regulated parties without a provable bribe. GAO reviews of the Federal Reserve, OCC, and FDIC found that regulators used some safeguards but needed stronger agency-wide frameworks, documentation, transparency, conflict controls, and capture-risk management. [9]-[11]

Administrative law also leaves broad room for nonenforcement. Heckler v. Chaney creates a presumption that individual agency refusals to enforce are unreviewable because agencies must balance resources, priorities, evidence, and policy. United States v. Texas reemphasizes executive enforcement discretion. Courts may compel action unlawfully withheld under 5 U.S.C. § 706(1), but only where law imposes a discrete, mandatory duty. [12]-[15]

Antitrust law has begun to recognize cumulative acquisition strategies. The 2023 Merger Guidelines state that a series of acquisitions may be reviewed as a pattern or strategy, and DOJ and FTC have sought information concerning roll-ups. This is a useful precedent for cumulative institutional review, but current merger analysis does not consistently evaluate practical-liberty harms, regulatory dependence, or the political consequences of concentrated control. [16]-[18]

Comparative systems offer additional tools. Australia's National Anti-Corruption Commission may investigate serious or systemic corruption involving parliamentarians, agency personnel, and contracted service providers. The EU Transparency Register links lobbying access to registration and expands disclosure of meetings. OECD integrity guidance recommends coordinated systems of transparency, participation, oversight, conflict management, lobbying integrity, and revolving-door controls. [19]-[25]

The recommended response is a new federal framework provisionally titled the Institutional Integrity and Regulatory Accountability Act (IIRAA). It should not criminalize policy error. It should create:

- A Practical Liberty and Public Interest Impact Review for specified mergers, deregulation, privatization, exclusive procurement, major waivers, and formal nonenforcement policies.
- A Systemic Regulatory Failure Petition allowing qualified persons, state attorneys general, inspectors general, and affected groups to request independent review.
- Public contact, lobbying, waiver, recusal, and future-employment negotiation logs for covered decisions.
- Cumulative acquisition and functional-concentration analysis in essential sectors.

- An independent Office of Regulatory Integrity with audit, subpoena, referral, and public-reporting powers.
- Graduated remedies separating policy error, negligent process failure, reckless disregard, prohibited conflicts, concealment, bribery, and intentional rights deprivation.
- Criminal referral only where existing elements are supported, rather than a new vague crime of constitutional erosion.

The principal conclusion is that the law should recognize systemic integrity failure as a reviewable institutional condition without confusing it with criminal corruption. The proper first response is disclosure, independent investigation, mandatory findings, reconsideration, recusal, corrective orders, contract or grant consequences, and civil enforcement. Criminal punishment should remain reserved for intentional, clearly defined misconduct.

1. Relationship to Area 3

Area 3 is citizen-facing. It asks whether private control in an essential system leaves a person without meaningful voice, exit, explanation, correction, organization, access, or remedy.

Area 4 is institution-facing. It asks whether public decisions, nondecisions, conflicts, capture, enforcement policies, merger approvals, subsidies, licensing, or procurement materially created or preserved the impairment.

Area	Question	Primary remedy
Area 3: Practical Liberty	What minimum rights must the citizen possess inside an essential private system?	Substantive and procedural rights
Area 4: Institutional Integrity	Did government improperly create, preserve, conceal, or refuse to correct the condition?	Investigation, disclosure, reconsideration, recusal, sanctions, referral

The same factual event may trigger both frameworks. A tenant may receive organizing rights under Area 3 while Area 4 examines whether concentrated property interests, selective enforcement, undisclosed contacts, or distorted rulemaking produced the underlying legal regime.

2. Existing Federal Criminal and Ethics Law

2.1 Bribery: 18 U.S.C. § 201

Section 201 criminalizes corrupt giving, offering, receiving, or agreeing to receive a thing of value in exchange for influence over an official act, fraud on the United States, or violation of official duty. Gratuity provisions cover things of value given for or because of official acts under a different standard. [1]

The statute is powerful where a concrete exchange can be proved. It is weak as a response to diffuse capture because relationships, access, ideological alignment, institutional dependence, and anticipated employment may influence policy without an explicit agreement. Supreme Court cases narrowing 'official act' and honest-services theories further caution against using general corruption statutes to punish ordinary political access or ambiguous favoritism.

2.2 Financial conflicts: 18 U.S.C. § 208

Section 208 prohibits executive-branch personnel from participating personally and substantially in a particular matter in which they know they, close family, partners, an employing organization, or a prospective employer possess a financial interest, subject to waivers and exemptions. The statute expressly reaches negotiations or arrangements for prospective employment. [2]

Its limitation is structural. It generally depends on a particular matter and a recognized financial interest. It does not comprehensively address agency culture, broad sector policy, informal affinity, repeated access, or career incentives not yet amounting to negotiations.

2.3 Revolving doors: 18 U.S.C. § 207 and ethics pledges

Section 207 restricts certain post-government communications and representations but does not prohibit a former official from accepting private employment. OGE guidance emphasizes that the statute contains permanent, two-year, one-year, and other restrictions tied to particular matters, official responsibility, and seniority. Procurement and executive ethics-pledge rules may add restrictions. [3]-[5]

This design leaves gaps. A former official may advise internally without making prohibited contacts; broad policy expertise may fall outside a particular matter involving specific parties; cooling-off periods may be short relative to the value of relationships; and pre-government industry ties may shape decisions even where recusal rules are technically satisfied.

2.4 Conspiracy and deprivation of rights: 18 U.S.C. §§ 241-242

Section 241 criminalizes an agreement to injure, oppress, threaten, or intimidate a person in the free exercise or enjoyment of a right secured by the Constitution or federal law. Section 242 applies where a person acting under color of law willfully subjects another to deprivation of a federally secured right. [6]-[7]

These statutes are essential but narrow. They require a clearly secured right and demanding intent. Section 241 requires an agreement; section 242 requires willfulness and color of law. They do not ordinarily criminalize weak antitrust enforcement, policy capture, agency delay, or regulatory choices that cumulatively reduce practical liberty.

2.5 Procurement integrity

The Procurement Integrity Act restricts disclosure and obtaining of contractor bid or proposal information and source-selection information, regulates compensation discussions, and provides civil, administrative, and criminal consequences. [8]

It demonstrates that Congress can impose special conflict, disclosure, certification, and post-employment rules around decisions where private economic stakes and public discretion intersect. Area 4 should adapt that logic beyond procurement to major regulatory and merger decisions.

3. The Regulatory-Capture Middle Zone

Regulatory capture is not synonymous with bribery. GAO reviews of large-bank supervision describe capture risks as threats to supervisory independence that may arise through conflicts, relationships, information asymmetry, repeated interaction, deference, and institutional culture.

GAO's Federal Reserve review found policies intended to manage capture risks but identified inconsistent implementation and documentation. Its OCC review recommended stronger agency-wide focus, documentation of communications and disagreements, and risk-management practices. Its FDIC review concluded that the agency could better address capture risks through clearer policies, documentation, examination review, and enterprise risk management. [9]-[11]

These reports support three conclusions:

- Capture can be systemic without a criminal quid pro quo.
- Documentation and internal challenge mechanisms are substantive safeguards, not clerical formalities.
- An agency may comply with individual ethics rules while lacking an institutional system for detecting cumulative influence.

OECD's Preventing Policy Capture report similarly treats capture as a broader policy-process problem requiring transparency, stakeholder participation, accountability, competition of ideas, conflict controls, lobbying regulation, and political-finance integrity. [24]

4. Nonenforcement and the Limits of Judicial Review

4.1 Heckler v. Chaney

Heckler v. Chaney held that an agency decision not to take enforcement action is presumptively committed to agency discretion under the APA. The Court reasoned that enforcement decisions require balancing resources, likelihood of success, policy priorities, and fit with the agency's overall program. [12]

The presumption is not absolute. Review may be available where substantive law supplies meaningful standards, where the agency relies on a belief that it lacks jurisdiction, or where a broad policy effectively abdicates a statutory responsibility. But individual nonenforcement remains difficult to challenge.

4.2 United States v. Texas

United States v. Texas reaffirmed the Executive's discretion over arrests and prosecutions and emphasized Article III limits on suits seeking to compel more enforcement. [13]

Area 4 therefore should not create a general judicial power to order investigations or prosecutions. It should create statutory duties to receive evidence, maintain records, issue written systemic findings, and perform independent review when defined thresholds are met.

4.3 APA tools that remain available

The APA gives interested persons a right to petition for rulemaking under 5 U.S.C. § 553(e). Section 706 directs courts to compel agency action unlawfully withheld or unreasonably delayed and set aside arbitrary or unlawful action. Those remedies are effective only when Congress supplies a discrete, legally required action or meaningful review standard. [14]-[15]

The legislative implication is direct: IIRAA should impose clear duties and deadlines rather than vague aspirations. For example, an integrity office 'shall determine within 120 days whether a petition satisfies the statutory threshold' and 'shall publish reasons for granting or denying review.'

5. Serial Consolidation and Functional Concentration

The 2023 Merger Guidelines recognize that a series of acquisitions may be evaluated collectively and may form part of an industry trend or strategy tending to create a monopoly. Guideline 8 specifically addresses serial acquisitions, and the agencies have sought information about roll-ups across sectors. [16]-[18]

This supports the user's core intuition: transaction-by-transaction review can miss cumulative control. The legally useful metric is not a raw acquisition count or an assumption of exponential growth. It is the progressive reduction of independent decision-makers, entry pathways, local alternatives, bargaining options, and institutional diversity.

Area 4 should extend cumulative review in essential sectors to include:

- Prior acquisitions by the buyer and related funds or affiliates.
- Common management, pricing, screening, data, cloud, and algorithmic infrastructure.
- Local and functional concentration, not merely national ownership.
- Dependency created by insurance networks, licenses, zoning, franchises, or government contracts.
- Effects on practical liberty: organizing, privacy, portability, access, autonomy, safety, and remedies.
- The combined political and regulatory influence created by concentration.

6. Lobbying, Access, and Decision Provenance

Influence is difficult to evaluate when the public cannot reconstruct who supplied information, requested changes, received waivers, or met decision-makers. Existing federal lobbying disclosure law captures some compensated lobbying but does not produce a complete decision-level record.

The EU Transparency Register provides a comparative model. It publicly identifies interest representatives and activities intended to influence EU policy. Registration is linked to access, and since January 2025 the European Commission has extended meeting-transparency requirements to all staff holding management functions. European Parliament reporting also includes declarations of meetings and, for rapporteurs, declarations of input received. [21]-[23]

The strongest mechanism to borrow is not a universal ban on private meetings. It is decision provenance:

- Publish covered meetings, participants, represented clients, and subject matter.
- Attach a list of material external inputs to final rules, merger decisions, waivers, and major enforcement policies.
- Disclose draft language or analytical models supplied by interested parties when materially relied upon.
- Record recusal decisions, ethics waivers, and future-employment negotiations relevant to the matter.
- Give affected public-interest and citizen groups a procedurally realistic opportunity to respond.

7. Comparative Integrity Institutions

7.1 Australia: National Anti-Corruption Commission

Australia's National Anti-Corruption Commission is an independent Commonwealth body with authority to investigate serious or systemic corrupt conduct involving parliamentarians, agency personnel, and contracted service providers. Anyone may submit information; the Commission may investigate referrals or act on its own motion within jurisdiction. [19]-[20]

The NACC model is relevant because Area 4 concerns systems rather than isolated crimes. Its strengths include jurisdiction over contractors, systemic-corruption framing, independent initiation, prevention, education, investigation, reporting, and referral.

7.2 OECD public-integrity framework

The OECD Public Integrity Handbook recommends a system-wide approach integrating commitment, responsibilities, strategy, standards, risk management, enforcement, oversight, participation, transparency, and evidence-based evaluation. Its lobbying recommendation, updated in 2024, emphasizes transparency and integrity in interactions between public officials and interest representatives. [24]-[25]

The central lesson is that integrity cannot be reduced to criminal prosecution. Prevention, access equality, documentation, public participation, and external oversight are separate institutional functions.

8. Proposed Legal Standard: Systemic Integrity Risk

Area 4 needs a trigger that is serious enough to justify investigation but does not presume corruption. The proposed Systemic Integrity Risk Test would be met when credible evidence supports at least four of the following factors, including either concentrated benefit or public-process distortion.

Factor	Illustrative evidence
Concentrated private benefit	A small set of firms or persons receives material economic, regulatory, or competitive advantage
Practical-liberty impairment	Area 3 finding involving housing, healthcare, finance, communications, employment, transportation, utilities, or ecology
Public-process distortion	Unequal access, undisclosed input, unexplained departures, selective data, suppressed staff analysis, or abnormal procedure
Conflict or revolving-door indicator	Financial interest, employment negotiation, recent representation, waiver, family or business tie, repeated personnel exchange
Serial regulatory accommodation	Repeated waivers, exemptions, nonenforcement, merger approvals, favorable interpretations, or procurement renewals
Functional concentration	Common ownership, common infrastructure, roll-ups, local bottlenecks, platform dependency, or coordinated decision systems
Remedial failure	Affected persons lack a meaningful administrative, judicial, market, or political remedy
Concealment or record failure	Missing contact logs, incomplete recusals, deleted records, false certifications, or undocumented deviations

A threshold finding should authorize investigation, not establish liability. Final outcomes should distinguish innocent explanation, process weakness, negligent failure, reckless disregard, prohibited conflict, concealment, quid pro quo corruption, and intentional rights deprivation.

9. Proposed Institutional Integrity and Regulatory Accountability Act

The recommended Act should function as a framework statute. It would create common procedures while leaving sector agencies responsible for substantive policy.

9.1 Title I - Definitions and coverage

- Covered decision: major merger, deregulation, privatization, exclusive procurement, sector-wide nonenforcement policy, significant waiver, licensing framework, or disposition materially affecting an essential system.
- Essential system: a sector designated under Area 3 or by statute.
- Interested private party, regulated entity, beneficial owner, lobbyist, former official, covered contact, future-employment negotiation, and practical-liberty impact.
- Systemic integrity risk and qualified petitioner.

9.2 Title II - Practical Liberty and Public Interest Impact Review

Before a covered decision becomes final, the responsible agency should assess:

- Market and functional concentration.
- Cumulative acquisition and waiver history.
- Effects on practical liberty and essential access.
- Availability of voice, exit, portability, appeal, and remedies.
- Distribution of benefits and burdens.
- Alternatives and less impairing options.
- Conflicts, recusals, lobbying contacts, and reliance on external submissions.

The review should not automatically prohibit the action. It should force a public record and permit tailored conditions.

9.3 Title III - Decision provenance and integrity disclosures

- Public contact logs for covered officials and decisions.
- Meeting participants, clients represented, subject, and materials submitted.
- Disclosure of significant staff disagreements and external analyses relied upon.
- Publication of ethics waivers, recusal determinations, and covered employment negotiations.
- Certification that the decision record is complete.
- Criminal or civil consequences for knowing falsification, not innocent clerical error.

9.4 Title IV - Systemic Regulatory Failure Petitions

A qualified petitioner should be able to submit documented evidence to an independent integrity office. The petition must identify the covered decision or pattern, affected essential system, concentrated benefit, practical-liberty impairment, and integrity indicators.

The office should be required to:

1. Acknowledge and preserve relevant records promptly.
2. Determine threshold sufficiency within a fixed period.
3. Publish a reasoned grant or denial, with protected information redacted.

4. Refer ordinary policy disputes to the responsible agency.
5. Open an audit or investigation where systemic integrity risk is shown.
6. Protect confidential sources and whistleblowers.

9.5 Title V - Office of Regulatory Integrity

The Act should establish an independent office modeled partly on inspectors general and comparative anti-corruption bodies. It should have:

- A fixed-term head removable only through a public written explanation, subject to constitutional design review.
- Authority to audit covered decision processes, subpoena records, interview officials and contractors, and make referrals.
- Own-motion authority for serious or systemic matters.
- Jurisdiction over federal officials, participating contractors, and recipients of specified federal funds.
- Direct reporting to Congress and public reporting with lawful redactions.
- No power to direct criminal prosecution or substitute its policy judgment for the responsible agency.

9.6 Title VI - Serial consolidation and roll-up review

- Mandatory disclosure of acquisition history beyond ordinary premerger windows for designated sectors.
- Aggregation of acquisitions by common funds, affiliates, management, and operational platforms.
- Review of below-threshold acquisitions forming part of a common strategy.
- Authority to impose interoperability, data separation, governance, access, divestiture, or reporting conditions where otherwise lawful.
- Retrospective studies comparing predicted and actual effects.

9.7 Title VII - Graduated remedies

Finding	Remedy
No misconduct; weak process	Recommendations, training, improved documentation
Negligent process failure	Corrective plan, re-review, audit, deadlines
Reckless disregard of required safeguards	Civil penalties, funding or procurement conditions, supervisory consequences
Prohibited conflict or nonrecusal	Disqualification, voidability where authorized, disgorgement, ethics discipline
Knowing concealment or false certification	Civil penalty, debarment, removal referral, possible false-statements referral
Quid pro quo or corrupt agreement	Referral under bribery, fraud, procurement, or other criminal law
Intentional deprivation of secured rights	Referral under 18 U.S.C. §§ 241-242 or other civil-rights law

10. Constitutional and Institutional Constraints

10.1 Separation of powers and enforcement discretion

The Act should not authorize courts or an integrity office to compel prosecutions. It should regulate process: record preservation, disclosures, review, findings, and reconsideration. Congress may create mandatory duties, but the statute should respect executive control over individual enforcement decisions.

10.2 First Amendment and petitioning

Lobbying and petitioning are constitutionally protected. Disclosure rules should regulate transparency, not viewpoint or access based on agreement with government. Registration-linked access conditions must be objective and should preserve citizen communications that are not professional influence activity.

10.3 Due process and vagueness

Terms such as capture, favoritism, and constitutional erosion are too vague for penalties. The Act should use objective acts: undisclosed meetings, false certifications, prohibited participation, missing records, covered employment negotiations, unexplained procedural departures, and statutory threshold factors.

10.4 Appointments and removal

Design of an independent integrity office must account for current separation-of-powers doctrine concerning appointment, removal, and executive supervision. Legislative counsel should determine whether the office is placed within an existing inspector-general structure, an executive agency, or a multimember commission.

10.5 Federalism

Direct federal regulation is strongest for federal agencies, interstate commerce, federal contractors, and grant recipients. States should be offered model legislation and funding rather than commanded to restructure their own ethics institutions.

11. Approaches Considered and Rejected

Approach	Disposition
Create a crime of regulatory capture	Rejected as vague and vulnerable to partisan abuse
Criminalize bad merger approval or deregulation	Rejected absent corrupt intent or violation of a clear duty
Expand §§ 241-242 to negligence	Rejected; would erode willfulness safeguards
Require courts to order agency enforcement	Rejected due enforcement discretion and Article III limits
Treat friendship or prior industry work as corruption	Rejected; use disclosure, recusal, and risk review
Ban all revolving-door employment	Rejected as overbroad; use tiered cooling-off, matter restrictions, and disclosure
Rely only on lobbying disclosure	Insufficient without decision provenance, oversight, and remedies
Rely only on inspectors general	Insufficient where jurisdiction or mandate excludes policy capture and cross-agency patterns
Use impact review plus independent systemic oversight	Recommended

12. Research Priorities Before Final Model Legislation

- Fifty-state comparison of ethics commissions, revolving-door periods, lobbying registers, inspector-general authority, and public-corruption statutes.
- Sector case studies in housing, healthcare, finance, technology, defense procurement, and environmental permitting.

- Empirical merger retrospectives on serial acquisitions and local functional concentration.
- Analysis of whether current federal lobbying reports can be linked to decision-level contact data.
- Design options for an integrity office consistent with post-2024 separation-of-powers doctrine.
- Whistleblower protection and confidential-source procedures.
- Standards for publication of internal agency disagreement without chilling candid deliberation.
- Integration with Area 3 practical-liberty findings and remedies.

13. Conclusion

Area 4 should proceed. Existing law addresses bribery, personal financial conflicts, post-employment contacts, procurement misconduct, and intentional rights deprivation. It does not adequately address the systemic middle zone in which concentrated private interests repeatedly shape public decisions through access, informational dependence, serial accommodations, revolving-door incentives, weak records, and broad nonenforcement discretion.

The answer should not be a vague punitive law. It should be a legally disciplined integrity framework that makes important decisions reconstructable, cumulative effects visible, conflicts reviewable, and systemic failures independently investigable.

The proposed governing principle is:

When credible evidence shows that public decisions or nonenforcement materially preserve concentrated private benefit while impairing practical liberty in an essential system, government must preserve the decision record, disclose relevant influence and conflicts, conduct independent review, issue reasoned findings, and apply graduated remedies proportionate to the proven misconduct.

Authorities and References

1. 18 U.S.C. § 201, Bribery of public officials and witnesses, https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title18-section201.
2. 18 U.S.C. § 208, Acts affecting a personal financial interest, https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title18-section208.
3. 18 U.S.C. § 207 and 5 C.F.R. part 2641, post-employment restrictions.
4. U.S. Office of Government Ethics, Summary of Post-Employment Restrictions of 18 U.S.C. § 207, DAEOgram 04x11.
5. U.S. Office of Government Ethics, legal advisories concerning executive ethics pledges and revolving-door restrictions, including LA-21-03, LA-21-05, and LA-22-07.
6. 18 U.S.C. § 241, Conspiracy against rights.
7. 18 U.S.C. § 242, Deprivation of rights under color of law, https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title18-section242.
8. 41 U.S.C. chapter 21, Restrictions on Obtaining and Disclosing Certain Information (Procurement Integrity Act).
9. U.S. Government Accountability Office, Large Bank Supervision: Improved Implementation of Federal Reserve Policies Could Help Mitigate Threats to Independence, GAO-18-118 (2017).
10. U.S. Government Accountability Office, Large Bank Supervision: OCC Could Better Address Risk of Regulatory Capture, GAO-19-69 (2019).
11. U.S. Government Accountability Office, Bank Supervision: FDIC Could Better Address Regulatory Capture Risks, GAO-20-519 (2020).
12. Heckler v. Chaney, 470 U.S. 821 (1985).
13. United States v. Texas, 599 U.S. 670 (2023), https://www.supremecourt.gov/opinions/22pdf/22-58_i425.pdf.
14. 5 U.S.C. § 553(e), right to petition for issuance, amendment, or repeal of a rule.
15. 5 U.S.C. § 706, scope of judicial review, including action unlawfully withheld or unreasonably delayed.
16. U.S. Department of Justice and Federal Trade Commission, 2023 Merger Guidelines, Guideline 8, https://www.justice.gov/d9/2023-12/2023%20Merger%20Guidelines.pdf.
17. U.S. Department of Justice, Guideline 8: When a Merger Is Part of a Series of Multiple Acquisitions, https://www.justice.gov/atr/merger-guidelines/applying-merger-guidelines/guideline-8.
18. U.S. Department of Justice and Federal Trade Commission, Request for Information on Serial Acquisitions and Roll-Up Strategies (May 23, 2024).
19. National Anti-Corruption Commission Act 2022 (Cth) (Australia); National Anti-Corruption Commission, Overview and Jurisdiction, https://www.nacc.gov.au/about-nacc/overview.
20. National Anti-Corruption Commission, What Can the NACC Investigate?, https://www.nacc.gov.au/reporting-and-investigating-corruption/what-investigate.
21. European Union Transparency Register, https://transparency-register.europa.eu/index_en.
22. European Commission, New transparency measures extending meeting requirements to management staff, effective Jan. 1, 2025.
23. EU Transparency Register Annual Report 2023.
24. OECD, Preventing Policy Capture: Integrity in Public Decision Making (2017).
25. OECD, Public Integrity Handbook (2020); OECD Recommendation on Transparency and Integrity in Lobbying (2024).
26. 5 U.S.C. chapter 4, Inspectors General, https://uscode.house.gov/view.xhtml?path=/prelim@title5/part1/chapter4.
27. McDonnell v. United States, 579 U.S. 550 (2016).
28. Skilling v. United States, 561 U.S. 358 (2010).
29. Practical Liberty in Essential Systems: Deep Research Report (Area 3, July 19, 2026).
30. Private Infrastructure, Public Power: Problem Brief (July 19, 2026).