



The Foundations of Corporate Strategies

Comment on “Part of the Solution’: Food Corporation Strategies for Regulatory Capture and Legitimacy”



William H. Wiist^{*}

Abstract

The “Part of the Solution” article describes how the food industry has evolved its strategies to respond to critics and government regulation by co-optation and appeasement to create a less hostile environment. Rather than focusing research on single industries it would be more efficient and productive to focus on corporate political activities (CPAs) that directly influence democratic institutions and processes having authority over laws, policy, rules and regulations that govern industry. The most influential and direct CPA are election campaign donations, lobbying, and the reverse revolving door. In the United States those CPA flow from rights of corporations that underlie all industry strategies. The US history of how corporations obtained their rights is described, and research about the affirmative effects of those three CPA is summarized. Health research is needed about those CPA and their effects on health law, policy and regulation in the United States and other nations.

Keywords: Corporate Political Activities, Non-market Strategies, Democracy, Corporate Rights, United States, Commercial Determinants of Health

Copyright: © 2022 The Author(s); Published by Kerman University of Medical Sciences. This is an open-access article distributed under the terms of the Creative Commons Attribution License (<https://creativecommons.org/licenses/by/4.0>), which permits unrestricted use, distribution, and reproduction in any medium, provided the original work is properly cited.

Citation: Wiist WH. The foundations of corporate strategies: Comment on “Part of the solution’: food corporation strategies for regulatory capture and legitimacy.” *Int J Health Policy Manag.* 2022;11(11):2732–2735. doi:10.34172/ijhpm.2022.7174

Article History:

Received: 11 February 2022

Accepted: 28 March 2022

ePublished: 5 April 2022

*Correspondence to:

William H. Wiist

Email:

wiiistw@oregonstate.edu

Lacy-Nichols and Williams¹ provided an extensive list of market and non-market strategies the food industry uses to counter health critics and government regulatory efforts. They usefully focus their analysis on the industry’s agile and responsive shift to “part of the solution” strategies based on regulatory responses and capture, relationship building and new market strategies. They describe how industry seeks to co-opt, appease and create an environment less hostile to business interests. The authors show how the industry promotes self-regulation, cultivates partnerships with credible stakeholders, and changes product portfolios to more closely align with health recommendations. Importantly, their description emphasizes that industries evolve in their strategies, and colonize processes, discourses and institutions.

Their review is similar to other enumerations of the multiple strategies used by single industries. Such reports, along with similar country-by-country identification of strategies, imply the need for separate interventions on multiple strategies for each industry and country. An alternative, more efficient and productive use of limited research and intervention resources would focus on proximal corporate political activities (CPAs) that directly influence democratic government institutions and processes that hold legal authority to establish, implement and enforce laws, policies, regulations and rules that govern industry. The following description of the origins and enumeration of corporate rights and the resultant CPAs

in the United States explicates that approach, and is applicable to other democratically governed nations.

US Geneses of Corporate Strategies

A pro-business bias was present in the United States from the initial European colonization of North America. The colonies themselves were corporations with investors, and their indentured servants, the colonists.^{2,3} (and soon, enslaved Africans). The abrogation of rights that were in colonial corporate charters stimulated the American Revolution, and those rights were reflected in the US Constitution and Bill of Rights.^{2,3} Colonial industries of black enslavement (eg, tobacco) and the commerce in stolen Native American’s land was fundamental to the nation’s development and integral to the lives of the nation’s founders. The underlying business ideologies of profit and race evolved through the War Against the Confederacy into the Gilded Age of extreme corporate power and wealth inequalities. They propagated in the post-World War I and II eras through prominent corporate leaders’ resistance to labor unions, racial integration, and social welfare programs, and their anti-communism. In the mid-twentieth century corporations began using propaganda to instill in the public consciousness the identification of free-enterprise with democracy and equating government interventions with tyranny and oppression.⁴ Later, business solidified its hold on society with strategic initiatives,⁵ the financial sector’s policy

role,⁶ and the influence of the CEO's role.⁷

Across US history the Congress, state legislatures, and especially the Supreme Court, established corporate rights (Figure). The Court based its decisions about corporate rights on: (a) the rights (eg, first Amendment freedom of speech) of the people behind the corporate entity ("piercing the veil") and (b) rights of corporate personhood. However, corporate rights were achieved less from Court decisions about the rights of the corporate entity than from larger fights for the rights for humans (eg, free speech), especially those of enslaved and free Blacks (ie, the 14th Amendment), and from long-running disputes over federal versus state control of business rights and rights of African-Americans.^{2,8}

Rights awarded to corporations include the right to sue and be sued; diversify and be integrated with other corporate units; own stock; initiate and sign contracts; have equal protection under the law and due process; freedom from unreasonable searches and seizure; compensation for government takings; jury trial in criminal and civil cases; freedom from double jeopardy; freedom from excessive fines; commercial speech; political speech; freedom of religion; to sue governments for loss of anticipated profits; shareholders subordinate to management; shareholder limited liability; and an unlimited lifespan. These rights underlie and enable all industry marketing and non-marketing strategies.

Democracy

The essence of democracy is that all citizens should have an equal voice so that political institutions are as responsive as possible to the interests and values of citizens,⁹ and it is in elections that democracy comes the closest to equality.¹⁰ Most people assume that the pursuit of equity is a major duty of government¹¹ but corporation's wealth gives them disproportionate access, preference, and influence¹² and distorts policy-makers' work toward those who can afford the cost.¹³ That distortion makes government less responsive to the average constituent, whose policy positions are negatively related to those of business.¹⁴ That undermines citizens' trust in their government¹² and leads them to view politicians as corrupt¹⁵ and, correctly, that ordinary citizens have little influence on policy.¹⁴

Direct Political Strategies

A wide range of practices have been categorized as CPA; some shape the opinion environment, others directly influence policy makers.¹² Three CPA are the most powerful and important because they are most proximal to the corporate rights that underlie industry strategies, and they are aimed directly at influencing democratic government institutions' and processes' (Figure) that have legal authority over corporations: (1) lobbying of legislative and executive branches of government, (2) donations to election campaigns, and (3) the "reverse revolving door" (RRD) (former corporate officials politically appointed to government positions with policy, decision-making and regulatory authority over industry). Each of the three CPA is complex, with many points of opportunity for industry to advance their agenda or to thwart policy change.¹¹

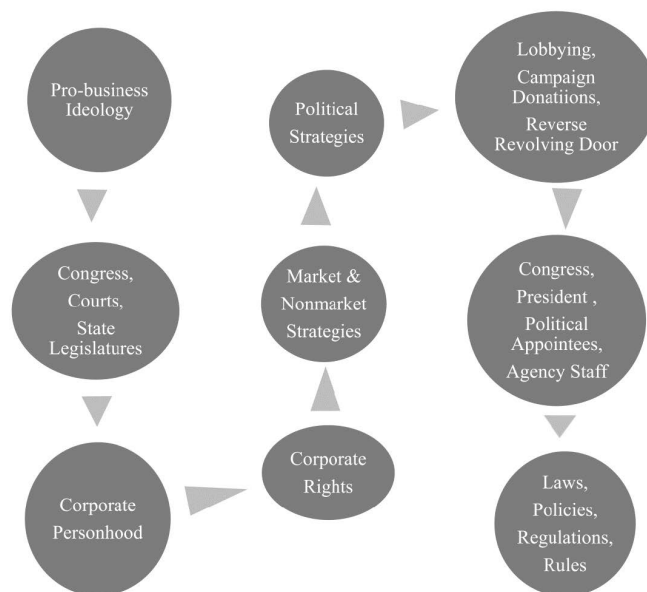


Figure. Pathway of Corporate Influence on Governing Institutions and Processes.

The empirical research findings about the effects of CPA activities on policy outcomes are mixed.¹⁶ Recently an increased study of political activities suggests their influences on health issues such as government efforts to control obesity and noncommunicable diseases in Thailand,¹⁷ self-regulation of food marketing to children in Malaysia,¹⁸ food marketing policies in Brazil,¹⁹ commercial milk formula policy in the Philippines²⁰ and food marketing in South Africa, Columbia and Indonesia.²¹ However, there has been little empirical health research into the three direct CPA discussed here.

Some countries, including the United States, have lobbyist registration and reporting requirements, laws regarding reporting of election campaign donations, and ethics codes and reporting rules for lobbyists, politicians, government officials and employees. Although the policies and procedures need greater transparency, public reporting, enforcement and data access, they have provided some data for research such as that cited below. Space limitations allow for only a brief description of key aspects of each of the three CPA and brief summaries of research findings.

Lobbying

Industry spends millions of dollars annually on lobbying²² conducted by employees, outside contractors or by industry associations. Many lobbyists are former congressional members or staff. Lobbying targets Congress and the executive branch, political appointees, staff who review legislation and regulations, and bureaucrats who write and enforce rules. Lobbyists subsidize strategically selected government officials with limited time and resources¹³ by serving as expert advisors to draft legislative bills, propose amendments, draft speeches, provide research reports or testimony, serve on advisory committees, assist in writing rules, build coalitions, mobilize constituencies, host fundraisers and donate to election campaigns and to politicians' affiliated foundations.

Most lobbying is conducted in low visibility settings, without

lobbyists' activity being recorded – before legislation reaches the voting stage, during the formulation of new policies, moving policy through committees (where procedures may be as important as position preferences), working on amendments, garnering support from other members of Congress, and in the day-to-day informal cultivation of friendly relationships with committee chairs and key members. Much lobbying is directed at regulatory agencies, particularly when an agency has requested public comments on proposed rules. Lobbyists are often the only ones to appear to testifying before regulatory committees.¹¹

Industry lobbying bends policy toward industry preferences²¹ and away from the preferences of the average citizen.¹¹ It can substantially benefit corporate financial returns, reduce effective corporate tax rates, shape deregulation policies, influence restrictions against unionization, influence marketing regulations, and influence healthcare expenditures, policies, and laws.^{23,24}

Election Campaign Donations

The US political system is money-driven so candidates spend a large proportion of their time fund-raising. Elections are the one direct threat to industry power over government¹⁰ so corporations and their wealthy officers and employees, and corporate earnings-derived charitable foundations²⁵ contribute billions of dollars¹⁰ *indirectly* to individual candidate's election campaigns and political parties and their conventions, and *directly* to campaigns through political action committees (PACs), Super PACs, and certain types of nonprofit organizations that do not have to identify donors ("dark money"). They also donate to ballot initiative campaigns. Members of congressional committees with industry-relevant policy expertise and jurisdiction over an industry are especially targeted by donors from those industries. Some countries (eg, Belgium, Canada, France, the United States) have bans on corporate donations directly to political parties and candidates.

Election campaign contributions give donors access to politicians to influence priorities and offer help, thereby creating obligatory bonds.²⁵ The more money a politician receives the more they are likely to give time and effort on the donor's behalf by speaking for their interests, adding amendments to a bill and showing up at committees to vote.¹⁰ Thus, corporations have disproportionate influence compared to the majority of average citizens who cannot afford to contribute significant amounts.²⁶

Donations to election campaigns increase the award of government contracts²⁷ and corporate profits, influence pro-business government spending and legislators' positions,²⁸ and votes favorable to corporations.²⁹ Corporations that make large political donations tend to be less compliant with regulations.²³ Politicians who receive the most corporate PAC money are more likely to vote favorably toward the contributing industry.³⁰ Contributions can affect safety inspections and citations for violations,²⁷ promote congressional advocacy of industry and support for pro-business spending programs.²⁸ Corporate donations can also signal bureaucrats that regulatory enforcement may be

troublesome.²⁷ Campaign funding especially goes to members of committees with industry-relevant policy expertise and jurisdiction of the contributing industry. Donations are likely to carry influence earlier and in less scrutinized, subtle legislative steps than highly visible votes.³¹

The Reverse Revolving Door

A US president makes thousands of political appointments of individuals from the private sector, many from corporations, to policymaking or decision-making positions in government as an agency head or other senior administrative positions, to regulatory commissions, advisory committees, boards or councils that have influence or authority over industry (RRD). Also, former corporate employees or lobbyists are frequently hired to staff congressional committees or member's offices. The corporate conflicts of interest of "reverse revolvers" may automatically and unconsciously³² influence their independence and their objectivity, leading them to biases in the formulation, adoption, and implementation of laws, policies and regulations to favor industry. Those biases may stem from: (a) reciprocity, the societally normalized internal belief that there is an obligation to reciprocate a favor with a favor,³³ and (b) a corporate orientation developed over a lifetime which can prevent them from completely separating their industry and government roles.³⁴

Some of the RRD benefits corporations receive include government bail-outs,³⁵ increased procurement contracts,³⁶ more lenient patent reviews,³⁷ more deregulatory reforms,³⁸ and increased revenue and profits³⁹; certification of safety compliance without required testing,⁴⁰ exclusion of health and sanitation provisions from standards,⁴¹ and more lax regulation.⁴²

Priorities for Future Research

Research into the influence of corporations on health would lead to greater progress for policy and advocacy if the research and professional education curricula emphasized industry's political activities aimed directly at democratic institutions and processes having legal authority over corporations. That work can build on social science theories, methods and data sources about CPA⁴³ to seek answers to health research questions about the effects of those activities on health law, policy, regulation, infrastructure, funding, programs and services, and population health⁴⁴ and natural environment outcomes.

Although the focus here is three CPA in the United States they also occur in other high income democratically governed nations (eg, European Union, United Kingdom, Canada, Australia, and Japan).⁴⁵⁻⁴⁹ Health researchers in undemocratically governed countries or emerging economies need to investigate the genesis of corporate rights and resultant predominant types of CPA.⁴⁷ In countries without strong institutions and systems of checks and balances, including public reporting on CPA, research methods used in other countries¹⁹ such as interviews with relevant individuals, news reports, websites, and other data sources can be used to study CPA.

Results of public health research on CPA will have

implications for policy and advocacy. Policies and procedures must be strengthened for managing conflict of interests for researchers,⁵⁰ health organizations⁵¹ and public officials,⁵² election campaign finance⁵³ and lobbying registration and disclosure.⁴⁸ Reclaiming democracy from CPA power will require a broad coalition of advocates with diverse interests unified on establishing a new balance of power to ensure that corporations exist for the public good, the people, and democracy⁸; to recreate corporations as agents of opportunity rather than recipients of privilege, to curb their potentially dangerous power and limit their contribution to inequalities³ in wealth and racial justice.

Alternatively to the three CPA research priorities proposed above, researchers who continue to prioritize studying single industry strategies should expand research to industries contributing to the most serious current threats to health and democracy, such as climate change (ie, fossil fuel industries), income and wealth inequality (ie, financial industries), war (ie, “defense” industries), autocratic and violent ideologies, false information, prejudice, and invasion of privacy, (eg, digital media industries), and the normalization of the pro-business ideology (ie, TV, film and publishing industries, and higher education).

The “Part of the Solution” article acknowledged election campaign funding, lobbying and the revolving door among the many industry non-market strategies used to manipulate policy-making and policy-makers. It identified the food industry’s adaptation to environmental conditions through appeasement, co-option and partnership as a form of consensual and socially legitimate power. This commentary focuses on how in the US industry came to have that power and exercise it, and in contrast to “Part of the Solutions,” proposes research priorities from among industry strategies. Health researchers are urged to move forward from the repetitive examination of single industry strategies and study the underlying foundations from which industry gains its power to employ whatever exiting or adaptive “solution” strategies it chooses. Research and advocacy could be more substantively and efficiently advanced by prioritizing the three CPA recommended herein rather than continuing the enumeration of industry strategies as in “Part of the Solution.” There are challenges to achieving that priority but it is imperative to overcome them in order to promote health and strengthen democracy.

Ethical issues

Not applicable.

Competing interests

Textbook royalties; personal financial donations to not-for-profit corporate reform advocacy organizations.

Author’s contribution

WHW is the single author of the paper.

References

- Lacy-Nichols J, Williams O. “Part of the Solution”: Food Corporation Strategies for Regulatory Capture and Legitimacy. *Int J Health Policy Manag.* 2021;10(12):845-856. doi:10.34172/ijhpm.2021.111
- Winkler A. *We the Corporations: How American Businesses Won Their Civil Rights.* New York: Liveright Publishing Corporation; 2018.
- Maier P. The revolutionary origins of the American corporation. *William Mary Q.* 1993;50(1):51-84. doi:10.2307/2947236
- Carey A. *Taking the Risk Out of Democracy: Corporate Propaganda versus Freedom and Liberty.* Urbana: University of Illinois Press; 1997.
- Powell LF Jr. Powell Memorandum: Attack on American Free Enterprise System. 1. August 1971. <https://scholarlycommons.law.wlu.edu/powellmemo/1>. Accessed January 13, 2022.
- Prins N. *All the Presidents’ Bankers: The Hidden Alliances that Drive American Power.* New York: Nation Books; 2014.
- Mizuchi MS, Marshall LJ. Corporate CEOs, 1890-2015: titans, bureaucrats, and saviors. *Annu Rev Sociol.* 2016;42(1):143-163. doi:10.1146/annurev-soc-081715-074233
- Powell JA, Watt C. Corporate prerogative, race, and identity under the fourteenth amendment. *Cardozo Law Rev.* 2010;32:885-904.
- Zakaras A. Expensive speech, illegitimate power: corporations and free expression. *Polity.* 2013;45(4):525-553. doi:10.1057/pol.2013.17
- Nichols J, McChesney RW. *Dollarocracy: How the Money and Media Election Complex is Destroying America.* New York: Nation Books; 2013.
- Page BI, Gilens M. *Democracy in America? What Has Gone Wrong and What We Can Do About it.* Chicago: University of Chicago Press; 2020.
- Nyberg D. Corporations, Politics, and Democracy: Corporate political activities as political corruption. *Organ Theory.* 2021;2(1). doi:10.1177/2631787720982618
- Hall RL, Deardorff AV. Lobbying as legislative subsidy. *Am Polit Sci Rev.* 2006;100(1):69-84. doi:10.1017/s0003055406062010
- Gilens M, Page BI. Testing theories of American politics: elites, interest groups, and average citizens. *Perspect Politics.* 2014;12(3):564-581. doi:10.1017/s1537592714001595
- Wike R, Silver L, Schumacher S, Connaughton A. Many in U.S., Western Europe Say Their Political System Needs Major Reform: Americans Are Especially Likely to Say Politicians Are Corrupt. Pew Research Center; 2021. <https://www.pewresearch.org/global/2021/03/31/many-in-us-western-europe-say-their-political-system-needs-major-reform/>. Accessed January 18, 2021.
- Alzola M. Corporate dystopia: the ethics of corporate political spending. *Bus Soc.* 2013;52(3):388-426. doi:10.1177/0007650312474952
- Jaichuen N, Phulkerd S, Certthrikul N, Sacks G, Tangcharoensathien V. Corporate political activity of major food companies in Thailand: an assessment and policy recommendations. *Global Health.* 2018;14(1):115. doi:10.1186/s12992-018-0432-z
- Ng S, Kelly B, Yeatman H, Swinburn B, Karupaiah T. Policy inertia on regulating food marketing to children: a case study of Malaysia. *Int J Environ Res Public Health.* 2021;18(18):9607. doi:10.3390/ijerph18189607
- Maranha Paes de Carvalho C, Johns P, Albiero M, et al. “Private and personal”: corporate political activity, informal governance, and the undermining of marketing regulation in Brazil. *Glob Public Health.* 2021;1-11. doi:10.1080/17441692.2021.1988128
- Baker P, Zambrano P, Mathisen R, et al. Breastfeeding, first-food systems and corporate power: a case study on the market and political practices of the transnational baby food industry and public health resistance in the Philippines. *Global Health.* 2021;17(1):125. doi:10.1186/s12992-021-00774-5
- Moodie R, Bennett E, Kwong E, et al. Ultra-processed profits: the political economy of countering the global spread of ultra-processed foods - a synthesis review on the market and political practices of transnational food corporations and strategic public health responses. *Int J Health Policy Manag.* 2021;10(12):968-982. doi:10.34172/ijhpm.2021.45
- Drutman L. *The Business of America is Lobbying: How Corporations Became Politicized and Politics Became More Corporate.* Oxford: Oxford University Press; 2015.
- Walker ET, Rea CM. The political mobilization of firms and industries. *Annu Rev Sociol.* 2014;40(1):281-304. doi:10.1146/annurev-soc-071913-043215
- McKay AM. Buying amendments? Lobbyists’ campaign contributions and microlegislation in the creation of the affordable care act. *Legis Stud Q.* 2020;45(2):327-360. doi:10.1111/lsq.12266
- Bertrand M, Bombardini M, Fisman R, Trebbi F. Tax-exempt lobbying: corporate philanthropy as a tool for political influence. *Am Econ Rev.* 2020;110(7):2065-2102. doi:10.1257/aer.20180615
- Gilens M. Descriptive representation, money, and political inequality in the United States. *Swiss Political Sci Rev.* 2015;21(2):222-228. doi:10.1111/

- spsr.12164
27. Witko C. Party government and variation in corporate influence on agency decision making: OSHA regulation, 1981-2006. *Soc Sci Q.* 2013; 94(4):894-911. doi:10.1111/ssq.12016
 28. Fellowes MC, Wolf PJ. Funding mechanisms and policy instruments: how business campaign contributions influence Congressional votes. *Polit Res Q.* 2004;57(2):315-324. doi:10.1177/106591290405700212
 29. Ard K, Garcia N, Kelly P. Another avenue of action: an examination of climate change countermovement industries' use of PAC donations and their relationship to Congressional voting over time. *Env Polit.* 2017; 26(6):1107-1131. doi:10.1080/09644016.2017.1366291
 30. Roscoe DD, Jenkins S. A meta-analysis of campaign contributions' impact on roll call voting. *Soc Sci Q.* 2005;86(1):52-68.
 31. Powell LW. The influence of campaign contributions on the legislative process. *Duke Journal of Constitutional Law & Public Policy.* 2014;9(1):75-101. doi:10.3998/mpub.2454352
 32. Akram S. Representative bureaucracy and unconscious bias: exploring the unconscious dimension of active representation. *Public Adm.* 2018; 96(1):119-133. doi:10.1111/padm.12376
 33. Jung Y, Hall J, Hong R, Goh T, Ong N, Tan N. Payback: effects of relationship and cultural norms on reciprocity. *Asian J Soc Psychol.* 2014; 17(3):160-172. doi:10.1111/ajsp.12057
 34. Tyllström A. More than a revolving door: corporate lobbying and the socialization of institutional carriers. *Organ Stud.* 2021;42(4):595-614. doi:10.1177/0170840619848014
 35. Louçã F, Ash M, Francisco L, Michael A. The revolving door. In: *Shadow Networks: Financial Disorder and the System That Caused Crisis.* New York, NY: Oxford University Press; 2018:208-244.
 36. Goldman E, Rocholl J, So J. Politically connected boards of directors and the allocation of procurement contracts. *Rev Financ.* 2013;17(5):1617-1648. doi:10.1093/rof/rfs039
 37. Tabakovic H, Wollmann TG. *From Revolving Doors to Regulatory Capture? Evidence from Patent Examiners.* Cambridge, MA: National Bureau of Economic Research; 2018:w24638. doi:10.3386/w24638
 38. Wirsching EM. The Revolving Door for Political Elites: An Empirical Analysis of the Linkages between Government Officials' Professional Background and Financial Regulation. In: *European Bank for Reconstruction and Development*; 2018:19. <https://www.oecd.org/corruption/integrity-forum/academic-papers/Wirsching.pdf>. Accessed June 3, 2020.
 39. Cingano F, Pinotti P. Politicians at work: the private returns and social costs of political connections. *J Eur Econ Assoc.* 2013;11(2):433-465. doi:10.1111/jeea.12001
 40. Shotts KW, Wiseman AE. The politics of investigations and regulatory enforcement by independent agents and cabinet appointees. *J Polit.* 2010;72(1):209-226. doi:10.1017/s0022381609990570
 41. Infante PF. The continuing struggle between career civil servants and political appointees in the development of government public health standards. *Int J Occup Environ Health.* 2016;22(4):269-273. doi:10.1080/10773525.2016.1245487
 42. Piller C. Hidden conflicts? *Science.* 2018;361(6397):16-20. doi:10.1126/science.361.6397.16
 43. Wiist WH. Studying the influence of corporations on democratic processes. In: *Researching Corporations and Global Health Governance: An Interdisciplinary Guide.* London: Rowman & Littlefield International Ltd; 2017:173-187.
 44. Barnish M, Tørnes M, Nelson-Horne B. How much evidence is there that political factors are related to population health outcomes? An internationally comparative systematic review. *BMJ Open.* 2018; 8(10):e020886. doi:10.1136/bmjopen-2017-020886
 45. Thiel M, Bauer E, Runcan IP. *Revolving Doors in the EU and US.* European Parliamentary Research Service; 2018:7.
 46. Coen D, Vannoni M. Sliding doors in Brussels: a career path analysis of EU affairs managers. *Eur J Polit Res.* 2016;55(4):811-826. doi:10.1111/1475-6765.12151
 47. Rajwani T, Liedong TA. Political activity and firm performance within nonmarket research: a review and international comparative assessment. *J World Bus.* 2015;50(2):273-283. doi:10.1016/j.jwb.2014.10.004
 48. Holman C, Luneburg W. Lobbying and transparency: a comparative analysis of regulatory reform. *Interest Groups Advocacy.* 2012;1(1):75-104. doi:10.1057/iga.2012.4
 49. Bombardini M, Trebbi F. Empirical models of lobbying. *Annu Rev Econom.* 2020;12:391-413. doi:10.1146/annurev-economics-082019-024350
 50. Galea S, Saitz R. Funding, institutional conflicts of interest, and schools of public health: realities and solutions. *JAMA.* 2017;317(17):1735-1736. doi:10.1001/jama.2017.1659
 51. Office of Compliance, Risk Management and Ethics. Code of Conduct for Responsible Research. World Health Organization; 2017:26. <https://www.who.int/about/ethics/code-of-conduct-for-responsible-research>. Accessed March 20, 2022.
 52. Cerrillo-i-Martinez A. Beyond revolving doors: the prevention of conflicts of interests through regulation. *Public Integr.* 2017;19(4):357-373. doi:10.1080/10999922.2016.1225479
 53. Krishnan C. *Tackling Corruption in Political Party Financing: Lessons from Global Regulatory Practices.* Cambridge, MA: Harvard University Edmond J. Safra Center for Ethics; 2014. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2433257. Accessed January 26, 2022.