BEYOND BRIBERY:

AN EXPLORATION INTO LOBBYING AND INTERNATIONAL CORPORATE INFLUENCE IN THE MIDDLE EAST

by

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ABSTRACT

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IN THE MIDDLE EAST

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Qualitative evidence suggests that corporations lobby within countries with informal structures abroad. While political science research on Western lobbying is robust, it falls short in understanding how multinational businesses operate in countries that do not possess regulated lobbying arenas. Given this, my research findings help fill a theoretical gap in political science literature by identifying how multinationals lobby within informal (unregulated) structures the same as they do within formal (regulated) arenas, like the US and EU. I argue that US multinational companies who engage the American lobbying arena are more likely to lobby within informal structures to ensure their strategic goals. I create a behavior index to identify lobbying within informal structures and operationalize both lobbying disclosure issue reports and newspaper article mentions of three Middle Eastern country case studies (Saudi Arabia, Egypt, and Jordan) to show how American companies lobby within both formal and informal structures. Overall, since we do not yet know much about lobbying in countries with unregulated structures, this thesis will help scholars begin to think about the variables that should be considered and the factors that might influence the occurrence of this activity.

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CHAPTER ONE

THEORITICAL ARGUMENT

Introduction

In the 21st century, American companies like General Electric (GE), Microsoft, and Goldman Sachs pay millions of dollars to executives that maintain corporate relationships with foreign governments, much like diplomats do for the US. Even Nani Beccalli, the chief executive of GE international, refers to himself as the "foreign minister of GE" (Deutsch 2002, 1). While these foreign government connections might be good for business, the power it gives top company executives can be problematic for policy and requires scholarly investigation.

Ever since business lobbying expanded to an unprecedented degree in America in the 1970s, responding to the growth of government regulation, corporations have increasingly relied on this avenue to gain access and provide information to lawmakers. The success businesses have experienced lobbying the American government has contributed to the professionalization of this activity within various countries around the world, even though Western lobbying structures do not represent the majority of state lobbying arenas. The problem for researchers is that state sovereignty allows corporate lobbying activity to be regulated and tracked in certain countries that have a network of laws and norms governing lobbying activity, while in other countries lobbying has been ignored because of the lack of laws structuring such activity. This makes it more difficult to understand what is going on. In other words, nonstate actors are able to influence policy while remaining in the shadows.

For example, in 2015, Gilead Sciences, an American biopharmaceutical company based in California negotiated a deal with the Egyptian government to help combat rising cases of hepatitis C. Gilead agreed to sell sofosbuvir to Egypt for around $10 a pill but required the

Egyptian government place harsh restrictions on pharmacies selling the drug to prevent it being sold on the black market (McNeil and El-Zohairy 2015, 1). That same year in America, Gilead spent about $2.94 million on seven US lobbying firms to represent their interests in Washington (Center for Responsive Politics: Gilead Sciences). The company also retained the most profitable lobbying firm in American, Akin Gump, an international law firm with specialized experience in the Middle East (Akin Gump 2018). The relationship between Gilead and Egypt was shaped by information and resources the company provided to combat the rising number of cases of hepatitis C. In America, Gilead was required to contract lobbyists and file government documents to disclose their interactions with government officials. In Egypt however, Gilead was not required to disclose their interactions with government officials since the country does not regulate lobbying.

The purpose of this study is to understand how multinational businesses that traditionally operate within formal, heavily regulated lobbying environments work in informal, unregulated structures. Specifically, I argue that multinationals who engage the United States (US) lobbying arena use the behavior they learn in the formal US structure and apply it abroad within informal arenas in the Middle East. Since the political science literature on lobbying in countries with informal arenas is sparse, this thesis provides a first step toward understanding this phenomenon by identifying what this activity is and which firms utilize it, and considers the implications of this understanding so future scholars can better study it. I examine how nonstate actors that lobby the political structures of three autocratic Middle Eastern countries (Saudi Arabia, Egypt, and Jordan). The analysis of intradisciplinary research in public policy and international relations will rely on both quantitative and qualitative information, however the qualitative analysis is the core of the study. Overall, this thesis is about exploring how companies lobby in countries with informal arenas, an understudied phenomenon, to provide a first step toward thinking more about how foreign corporations lobby to shape policy using unregulated structures in autocratic states. Given that the literature on lobbying in America and Europe is robust but is less so regarding autocratic states, this thesis will help fill a theoretical gap in the lobbying literature. Since we do not yet know much about lobbying in countries with unregulated structures, this thesis will also help scholars begin to think about the variables that should be considered and factors that might influence this activity.

The qualitative evidence provided by newspaper articles reveal that US businesses do lobby government officials in Saudi, Egypt, and Jordan. However, because this concept is difficult to measure, I use media reports and an index for subjective intensity as an innovative way to measure lobbying. A few of these companies include Uber, Shell, Boeing, and McKinsey & Co., an international business consulting firm. Although the quantitative analysis does not find a causal relationship between corporate lobbying in the US and lobbying in informal structures, the descriptive examples of corporate lobbying in Saudi Arabia, Egypt, and Jordan suggest that when companies meet with a king, prince or head of government, then they will also have business contracts and negotiations within the informal arenas as well. Overall, I determine that lobbying in informal structures, such as the Middle East, is an important phenomenon to understand because these arenas allow nonstate actors, namely multinational businesses, to influence policymaking in the shadows since informal structures do not monitor this activity to ensure accountability.

The Argument Introduced

The ability of nonstate actors to influence state policy has significantly grown as states and industries have become more interdependent and globalized. For example, Bair and

Palpacuer (2015, 1-2) argue "the globalization of production, finance, trade and investment has proceeded at so brisk a pace that the regulatory capacities of national governments and the international institutions inherited from the Bretton Woods era are no longer able to cope." Given that international law has been slow to respond to the rapid changes taking place throughout the world, the lobbying activity of companies within informal arenas requires further investigation because we do not know how US companies influence policy when they lobby within informal structures, because there are no laws in place that allow scholars to track lobbying activity. This is especially important given that international institutions cannot effectively regulate this behavior within sovereign states, which complicates how corporate firms behave within the international system.

This project looks further afield from the emphasis on American examples to approach American companies as strategic actors that rely on different structures (both formally regulated lobbying structures and also informal unregulated arenas) to accomplish their lobbying goals. Formal arenas (like the US) describe political structures that constrain lobbying activity through legally-binding norms and rules, and informal arenas (such as those in the Middle East) do not explicitly regulate lobbying by law. This research focuses on the formal and informal political structures that nonstate actors lobby to establish and ensure policy favorable to them. Specifically, I use multinational companies, one type of nonstate actor, to identify US corporate lobbying within the informal arenas of Saudi, Egypt, and Jordan.

Do multinational companies replicate behavior they learn from previous experience lobbying within the US abroad in informal structures (to ensure favorable conditions for business operations) in the Middle East? The term lobbying, here, is understood as Drutman (2015, 15) defines as "any activity oriented towards shaping public policy outcomes." The author suggests that corporate managers hire lobbyists to gain access and provide information to lawmakers (Drutman 2015, 24-50). Whether taking a member of Congress out to lunch or meeting in a formal office setting to discuss policy issues, informing policymakers is influential in that it allows lobbyists to shape the political agenda (ibid). This is because decision-makers do not have the mental capacity to consider each issue. Therefore, inevitably, some issues will be considered while others will not. This research rests on the assumption that lobbying within informal structures (which is indicative of any behavior that would be classified as lobbying within a country that regulates this activity) can influence government decision-making.

Throughout the text, the terms formal and informal structures (or arenas) are used to describe lobbying that US companies employ to gain access to political decision-makers. Formal arenas represent countries that have laws in place to limit lobbying activity, such as the US and European Union (EU), which require lobbyists to report general information about their interactions with policymakers, client names, and financial transactions (Drutman 11, 97-98, 2015; Mahoney 26-29, 2008). Within these formal structures, however, lobbying is performed by either in-house (as company employees) or contract (other firms that work for a separate entity, other than the business client) lobbyists. Within the formal US arena, lobbyists have specialized access to lawmakers through previous political experience and contacts.

Informal arenas, on the other hand, are countries that do not regulate lobbying. Within these structures, lobbying (at least beyond the bounds of bribery[1]) is not restricted by law but nonetheless influences policy. What type of activities constitute lobbying? The US International Revenue Service (IRS) recognizes two types of lobbying activity: political and legislative activities. I will only focus on legislative activities, because autocratic governments are not

[1] The term bribery is understood as Bard Harstad and Jakob Svensson (2011, 46) define as, attempts "to bend or get around existing rules or policies", where lobbying seeks to alter existing law or regulation.

elected officials and therefore do not receive financial contributions for political campaigns as Western politicians do.[2] According to the IRS, legislative activities include any "activity that attempts to influence legislation" (IRS). In the West, lobbying is not defined by its physical activity, but rather its intangible objective to influence policy. Specifically, any meeting between a government official and firm (or firm representative) attempting to influence legislation by contacting "members or employees of a legislative body for the purpose of proposing, supporting, or opposing legislation, or if the organization advocates the adoption or rejection of legislation" (ibid). The point is, is that meetings and other formal interactions between government officials and firms happen, but they occur in different arenas, one regulated where influence can be tracked accordingly, and the other unregulated where influence is curbed merely by anti-bribery laws that do not track how lobbying influences policy.

Overall, the issue arises when firms lobby in unregulated autocratic arenas form political relationships with government officials through professional interactions and meetings that can influence policy without having to resort to corruption or bribery. Although this behavior is not illegal or corrupt, it is still important to identify because of the issues that arise when nonstate actors have unregulated access to government officials (Bouwen 2004, 337-338). Unregulated access to decision-makers allows business and government to form relationships that are not constrained by rules and norms that typically limit behavior and access, similar to the way Gilead was able to persuade the Egyptian government to impose strict requirements on individuals taking their product. Without these legal boundaries in place to constrain behavior lobbying activity has no limitations beyond the scope of bribery. This is a problem because lobbying regulation typically includes transparency requirements that deter unethical behavior, but

[2] Political activities include financial contributions and active participations in political campaigns, which the IRS considers lobbying (IRS).

autocratic governments are hesitant to incorporate transparency laws because it would also open their systems to accountability and scrutiny.

To fully understand the main idea of this thesis, the reader should consider these points as the most important points or issues developed within this study:

- The strategic engagement of corporate lobbying;
- The effects of political systems and regulation on lobbying behavior;
- Corporate lobbying on foreign policy within the US;
- The lobbying that multinational corporations employ within countries that do not regulate this activity, specifically in Saudi, Egypt, and Jordan;
- The fact that lobbying occurs within informal systems and does not always include unethical behavior;
- The use of both formal and informal lobbying structures to maximize corporate lobbying outputs.

Lobbying avenues, whether that be the formal regulated US arena or an informal meeting with a foreign government official abroad, that multinationals utilize to accomplish their corporate goals should be further investigated. This phenomenon is important because we do not know how multinational companies strategically use formal and informal structures to accomplish their corporate goals within host states, since most of this research is focused on fiscal implications caused by multinational's entrance or departure from these countries (Gilpin and Gilpin 2000, 5). My argument uses literature on corporate lobbying in the US to explore corporate lobbying within informal arenas to assess a concept that is understudied in political science research. Therefore, this thesis will benefit scholars by assessing how foreign firms lobby within informal structures to influence policy in their favor

As of 2015 there were only 20 countries in the world that enforce lobbying regulations at the national level[3] (Watson 2016, 2). Lobbying regulation is important because it defines the

[3] The 20 countries that regulate lobbying include Australia, Austria, Brazil, Canada, Chile, France, Georgia, Germany, Ireland, Israel, Lithuania, Macedonia, Montenegro, the Netherlands, Peru, Poland, Slovenia, Taiwan, United Kingdom, the European Union, and the United States (Watson 2016, 2).

legal limits of lobbying, which constrains activity by imposing accountability standards. Accountability is important because corporations focus on profit, not human progress or public good, so their semi-secret lobbying activities hide policymaking from the public eye. Drutman argues (2015, 9-15) that the driving force behind corporate lobbying is access. Having open access to lawmakers allows firms to provide information and remain competitive within financial markets. Furthermore, it is necessary to know whether lobbying in formal structures influences lobbying activity within informal arenas, because, similar to formal structures, these informal avenues provide favorable access to lawmakers that place corporations in a position that requires them to supply information that can shape how issues are understood and policy is formed (ibid).

The Rise of Corporate Lobbying

Lee Drutman (cited in Minow 2015, 4) argues that once businesses hire a lobbyist, corporate managers (or agents responsible for running the company) see lobbyists as strategic actors that provide information and access to policymakers, which essentially make them more competitive. This is because corporate managers become internal advocates for lobbying and "begin to pay more attention to politics, and in so doing they see more reasons why they should be politically active" (Business Insider 2015, 3). Therefore, corporate lobbying is self-reinforcing in that it creates its own internal momentum because lobbyists will always find new problems and issues that require advocating.

In the US, corporate firms started lobbying government in the late 1960s and early 1970s after Congress began regulating environmental and consumer safety issues. In response, those most affected by these regulations turned to lobbying because the "business community lacked both the political will and the political capacity to stop it" (Business Insider 2015). This began the professionalization of lobbying within the US. Then, just when the 60s and 70s brought the

American business lobby together, the 1980s tore them apart. The 80s consisted of overwhelming growth for business competition. Ronald Regan implemented a new era of free enterprise and small government, and globalization allowed foreign businesses to enter the US market (Drutman 2015, 59-63). From there, the 1990s set the stage for the pervasive position of business lobbying in America that we understand today. During this time, the battle over healthcare superseded all other issues. The healthcare controversy brought businesses together, allowing them to form coalitions that sparked a new style of lobbying that utilized grassroots campaigns (Drutman 2015, 63-65). Today, lobbying provides access to lawmakers before law is changed, which makes it universally desirable to ensure policy status quos across industries.

Here, it is understood that formal arenas inherently possess intangible networks that are created when governments adopt laws to constrain lobbying behavior. Holman and Luneburg (2012, 75) support this claim, and explain that "[l]obbying regulation from the North American perspective is designed largely to enhance transparency, reduce corruption in the policymaking process and promote public accountability of decision makers." Regulations create norms by limiting the type of behavior that is acceptably practiced within lobbying arenas, which ultimately influences the behavior of actors within the lobbying network. Conor McGrath (2006, 131) argues that "[r]egulation constitutes an aspect of professionalization which presents significant questions and leads to strong beliefs among practitioners about the most appropriate mechanisms to adopt." Therefore, we can conclude that the norms and rules produced when companies lobby in formal arenas constrain the behavior of those who engage them because they determine how lobbyists can legally interact with government.

Informal Structures in the Middle East

Informal arenas are structures that are not regulated by law, meaning there is no law to limit lobbying behavior beyond the bounds of corruption and bribery. McGrath (ibid) argues that lobbying can (and does) occur within informal arenas, however these structures lack the necessary rules and norms that professionalize lobbying industries such as those found within Europe and America. Lobbying within informal arenas, then, is understood as any activity that allows businesses to provide government with relevant information that can influence policy in some capacity. Additionally, in autocratic states, since public debate does not occur and policy debates take place within very small circles of actors directly connected to the regime, norms regarding access and who to target, and what is acceptable, have emerged that are very different from the norms found in regulated arenas.

When states began forming in the Middle East, private property did not exist. Instead, land was owned solely by the state, and rulers were allowed to grant temporary property rights to individuals to cultivate produce from the land (Richards and Waterbury 2008, 36-37). This empowered regional governing factions because it allowed them to exercise partiality when choosing tax-farmers, tribute gatherers, and rural notables. However, the mid- to late nineteenth century, under the control of the Ottoman Empire, marked a turning point for corporate interests in the region. In efforts to increase state revenue and the sultan’s tax base, Ottoman governors granted private title land to anyone who could pay in cash. The privatization of land ownership, implementation of a tax system, and the growth of rural nobility through trade and tax-farming attracted foreign capital to invest in agricultural exporting.

During the Ottoman reign, corporate interests began infiltrating Middle Eastern markets. In fact, it was the Ottoman bank (created in 1856) that initiated the relationship between government and corporate interests and set the stage for business ventures in the region (Mellahi et al. 2011, 406). There is also evidence that multinationals gain valuable knowledge from their experience in different markets. Mellahi et al. (ibid) explain that Nestlé utilized reverse knowledge transfer from their business experience in Istanbul to punctuate the European market thereafter. Mellahi et al.'s findings suggest that multinationals rely on previously learned behavior and can incorporate it when entering new market environments, even when those markets are fundamentally different from what they know.

This thesis is an introductory analysis that explores how corporate lobbying can influence policy in countries that do not have laws in place to facilitate its practices. Since scholars already know a lot about lobbying in America, my goal is to contribute to the academic knowledge about nonstate actors influencing policy by exploring how companies rely on Western lobbying behavior to influence policy in the Middle East.

Overview of Thesis Chapters

The rest of the thesis is composed of three chapters, that gives the reader background information and context about corporate lobbying. Chapter Two evaluates the research question and concepts, introduces the theoretical and methodological frameworks, assesses the literature on lobbying in formal and informal structures, and provides real-world examples of corporate lobbying using three country case studies. Here, the research question that seeks to understand how multinational businesses that traditionally operate within formal, heavily regulated lobbying environments work in informal, un-regulated structures is discussed in depth. Lee Drutman's (2015, 195) theoretical framework that argues there is a self-reinforcing "stickiness" that drives moneyed interests to lobby, is also assessed in Chapter Two.

Chapter Three offers descriptive and empirical evidence based on findings from the research data. Also, the hypothesis that suggests US businesses that lobby more in American will also lobby more in informal structures, is also discussed. Specifically, I use a zero-inflated negative binomial regression model to test my hypothesis by operationalization Lobbying Disclosure Act (LDA) issue reports, business profiles, and newspaper articles to understand how corporate interests lobby within informal structures. Chapter Four, the final section, summarizes the empirical findings and considers the implications caused by corporate interests that lobby within countries with informal arenas.

CHAPTER TWO

FORMAL AND INFORMAL STRUCTURES

Introduction

Why should we expect autocratic governments to open their systems to US firms? After all, it is true that autocratic governments are hesitant to regulate lobbying because transparency laws would open their systems to accountability and Western scrutiny that, they fear, would ultimately weaken their political legitimacy and control. However, because autocratic governments themselves lobby in America, share personal and professional ties with businesses, and have recently experienced regional political and economic changes, it is important to reassess our understanding of how US businesses can influence policymaking in the Middle East.

Chapter Two will assess the theoretical and qualitative evidence for both formal and informal lobbying structures. The first section defines formal lobbying structures using the American arena to emphasize the professionalization of lobbying in the West. Then, to clarify why US businesses would use similar Western lobbying practices within the Middle East, I rely on theories from Mellahi et al. (2011) and Drutman (2015) to explain businesses lobbying in countries with informal structures and identify how ongoing political and economic changes have contributed to the growth of lobbying within autocratic states. Finally, for each of the three case studies, the qualitative analysis assesses country-specific political factors, how foreign investment policy change has occurred over time, and gives examples of lobbying in Saudi Arabia, Egypt, and Jordan using evidence from newspaper articles.

The Formal American Structure

Lobbying in the US has many purposes (direct influence, providing information, monitoring policy, political intelligence, etc.), but its main goal is to provide legislative subsidy to US congressional representatives and their staff through regulated networks. According to Hall and Deardorff (2006, 72), groups choose to lobby legislators whose interests already align with their own because they want "to subsidize the legislative resources of members who already support the cause of the group" to help them accomplish their legislative goals. Therefore, lobbying influences policy in the US by providing useful information to legislators. Policy is influenced when legislators allocate attention to certain issues over others because there are an infinite number of policy issues that plague the US government. Therefore, since the human brain does not possess the mental capacity to consider each issue, when legislators focus on certain issues they inherently ignore others which inevitably places a hierarchy on the importance of certain issues over others (ibid).

In America, lobbying has been transformed into a professionalized network of information sharing that shapes policy outcomes. [4] Special interests purchase lobbying as political insurance to ensure government gives their specific issue attention or, at the very least, some form of legislative consideration (LaPira and Thomas 2016, 2). This purchase typically includes extensive policy expertise and/or "insider political knowledge" regardless of the policy substance in question (LaPira and Thomas 2016, 4). Insider access is extremely valuable if the hired lobbyist has spun through the revolving door, which results from political connections made while previously employed by government. These political connections serve as prerequisites for legislative access and attention within the decision-making process, which allows revolving door lobbyists to rely less on the subject matter of their lobbying and more on their fostered relationships with decision-makers. For example, Bertrand et al. (2014, 3905) find

[4] In *The Business of America is Lobbying*, Drutman (2015, 194) gives three primary reasons for the growth of business lobbying in America: expansion of government, changes in government activity (government attention), and the growth businesses. Reacting to the growth of government regulations brought on by these political and economic changes, corporations began lobbying to protect industry status quos.

"evidence that lobbyists follow the lawmakers that they have connections with when those lawmakers switch committee assignments." This type of environment favors those with previous government experience (because their relationships with other legislators are preserved) and gives off the impression that government prioritizes lobbyists with whom they have a relationship with, regardless of the salience or type of issue at hand.

LaPira and Thomas (2017, 56) argue that interest groups and other non-state actors rely on lobbyists' strategic behavior to "reduce the political uncertainty that some government action will occur without ample warning." Furthermore, the authors (2017, 57) maintain that "lobbyists provide information about the political process to their clients, reducing uncertainty about potential changes to the policy landscape." This behavior, therefore, aims to both minimize losses and maximize a competitive advantage through lobbying advocacy.

The Business of Lobbying in America

When companies invest in lobbying they realize how important and rewarding it can be to their collective benefit and consequently cannot confidently escape the world of political lobbying. This is primarily because lobbyists have proven this type of political engagement is necessary by overemphasizing possible threats and beneficial opportunities that are deterred or enhanced by businesses engaging in lobbying (Drutman 2015, 2). "Over time, lobbyists teach corporate managers about the value of political engagement, making the case for continued and often expanding lobbying expenditures" (ibid).

As corporate managers become more politically informed and realize the benefits of political lobbying, they begin to use government as a tool and lobbyists as the actors who dictate how this tool constructs policy (Drutman 2015, 7). This intensifies the competitiveness of business organizations who desire to influence policy decisions and, as a result, legislation has become more complex (in efforts to accommodate the influx of lobbying interests). Furthermore, Drutman (2015, 8) argues, "As companies do more lobbying, they tend to get involved in more and different issues." This implies that businesses who accomplish their lobbying agenda(s) associate this avenue as a means of influence, especially useful in shaping new strategic policy outcomes while also solidifying previous gains. Due to the general uncertain nature of politics, corporate managers internally reinforce the stickiness of corporate lobbying. Once they invest in lobbying, managers see lobbyists as strategic actors that provide information and access to policymakers and ultimately place them in a more competitive market position (ibid).

Drutman (2015) uses a sample of 1,066 companies to test the theory that corporate lobbying in America is a self-perpetuating, sticky, phenomenon. This sample was taken from an original dataset the author created that accounts for companies listed in both the S&P 500 and Washington Representatives lobbying index between 1981 and 2006. Using the complete set of S&P 500 lobbying time series data (1981-2004), he identified the size of each company's lobbying presence by adding the total number of in-house lobbyists together with the number of outside lobbying firms retained. The findings argue that, regardless of the intensity of lobbying, corporate lobbying remained consistent over-time (for years one, five, and nine).

Because scholars have yet to propose a formal theory that explains lobbying within informal networks, I rely on two theories to support its investigation. First, I use Drutman's (2015) theory that business lobby in America because it inherently possesses a self-reinforcing stickiness because businesses recognize its political utility. Additionally, I use Mellahi et al.'s (2011) theory, that businesses use reverse knowledge transfer when entering new market environments as the theoretical foundation for business lobbying in countries with informal-autocratic political structures. In order to understand whether government decision-making has become vulnerable to losing its exclusivity in the Middle East, I rely on information about corporate lobbying within the formal US arena to establish a theoretical basis for learned lobbying behavior and stickiness. Also, I use US corporate lobbying behavior (such as meeting with a government official to provide information that has the intension of influencing policy) to identify research parameters for measuring informal lobbying activity in the Middle East.

Lastly, this research questions how multinational companies lobby both formal structures in the US and informal arenas abroad to accomplish their organizational goals.[5] I argue multinational businesses will engage in informal lobbying in the Middle East because they are familiar with the benefits that result from actively engaging with government to implement favorable policy in America and have transferred this previously learned knowledge to their activity abroad, which is supported by both Drutman (2015) and Mellahi et al.'s (2011) theories.

Lobbying in Autocratic States

Autocratic governments are hesitant to regulate lobbying because transparency laws would hold their systems accountable to Western norms and scrutiny that, they fear, would ultimately weaken their political legitimacy and control. Additionally, Brent E. Sasley (2002, 150; 157-161) suggests these regimes fear changes that require opening their systems to foreign actors outside of their control because it would undermine their hold on power. By keeping their lobbying systems unregulated, regimes are free to amend the rules as they want and are not accountable to foreign actors. Essentially, they believe this control allows them to remain in power.

However, IR literature suggests (Jacoby and Sasley 2002, 3; Sasley 2002, 150; Haddad et al. 2012, 21) there has been a characterizing shift in the expectations of state behavior that once

[5] According to Joe Evans (2012, 2-5), to accomplish their organizational goals, multinationals must maximize profitability, allocate resources, localize business strategies, and adapt to foreign markets.

allowed leaders to deflect from democracy to prioritize factors that preserve the state. [6] This is especially true given that governments throughout the Middle East have become much more aware of their mortality since the 2010-2012 Arab Uprisings that caused political upheaval and toppled longstanding regimes across the Middle East and North Africa in response to widespread grievances held about the state (Haddad et al. 2012, 21).[7] These changes have made autocratic regimes reconsider opening their systems to foreign nonstate actors.

There are a few reasons why we should expect autocratic governments to open their systems to Western lobbying activities. First, since autocratic governments lobby in the US they are familiar with and employ for-hire lobbyists when lobbying in the West. In fact, experts on the statute that governs American lobbying for foreign governments argue that the relationships between thinktanks and foreign governments has "opened a whole new window into an aspect of the influence-buying in Washing that has not previously been exposed" to them (Lipton et al. 2014, 1). For example, a 2013 study published by Sergey Kostyaev tested the relationship between autocratic regime change[8] and foreign government lobbying expenditures in the US found that, out of the seven country case studies, Saudi and Egypt spent the most money lobbying the US government between 1940 and 2012 (Kostyaev 2013, 62). In fact, in 2013 alone Saudi spent $11.3 million lobbying the US government (Itkowitz 2014, 1).

In addition, we should expect similar lobbying activity in autocratic states because autocratic governments utilize US businesses for both business and personal matters. For example, Boeing provides Middle Eastern governments with military, business, and personal jets

[6] Also, the issues that characterize the international system today, such as poverty, underdevelopment, ecological scarcity, overpopulation, and lobbying cannot be contained to only one state (Sasley 2002, 11).
[7] Fed up with marginal economic growth, increasing income inequality, rising unemployment, declining education structures, bureaucratic inefficiency and (most of all) institutionalized regime corruption, the people of the Arab world began to challenge their political oppressors (Haddad et al. 21).
[8] Kostyaev included eight countries in the study, including Bahrain, Egypt, Libya, Pakistan, Saudi Arabia, Syria, Tunisia, and Yemen.

and private planes (Said 2010, 1). Additionally, in 2010, Saudi Prince Alwaleed Bin Talal launched an Arabic news channel with Fox Network in efforts increase news viewership. Therefore, it is clear that American businesses have similar ties to foreign government leaders as they do to leaders in the US based on the information and services they provide, which grants them elite access to foreign officials.

Similar to the political and economic transitions that shaped the American business lobby in the 1970s, the Middle East has experienced its own set of changes that has reshaped regional status quos and placed corporate interests in positions that are more influential than in the past. These changes have contributed to the regional trend of diversifying state economies, which has caused these autocratic states to alter their foreign investment laws in efforts to increase foreign direct investment (FDI) inflows (Lambrianos-Sabeh and Graves 2016, 1). Also, attempting to diversify their state economies and coax economic development many Arab governments are making it more desirable for foreign businesses to engage their domestic markets. This is most obvious in countries like Saudi Arabia and Qatar, because of their economic overreliance on state-owned oil reserves (ibid). This was most notable after the price of oil collapsed in 2014, causing several Arab states (Oman, Qatar, and Saudi Arabia specifically[9]) to borrow billions from US banks to invest in diversifying their economies away from oil and gas (ibid).

Furthermore, given rising unemployment and deteriorating economic opportunity, the 2010-2012 Arab uprisings that took place throughout the Middle East was a wakeup call for some regional regimes to invest in economic diversification to mitigate the public's growing disdain for government. These Uprisings were distinct from previous regional grassroots protests

[9] Oman borrowed $1 billion, Qatar $5.5 billion, and Saudi Arabia was loaned $10 billion (Lambrianos-Sabeh and Graves 2016, 1).

because some of them were successful early-on, specifically in Tunisia and Egypt[10], which gave hope to others experiencing the same issues throughout the Middle East and North Africa (MENA) (Heydemann 2016, 193; Dalacoura 2012, 64). The Uprisings exemplify the collective emotion of frustration and rage over the fact that the autocratic state was neither accountable nor effective. After the regional protests subsided, and the political dust began to settle, businesses began to flock to the region because assets were cheap from looting that took place during the protests, and rebuilding was necessary to deter further action.

While struggling to diversify their state economies and promote regional foreign investment, several Middle Eastern governments have altered the legal rules and norms that constrain foreign direct investment without having to impose American-style regulations. For example, Saudi Arabia, the United Arab Emirates (UAE), and Iran eased regulations for foreign companies to enter their economic markets by removing legal obligations that required foreign investors to partner with local businesses (Kedem 2017, 1). The UAE, for instance, will implement a law in 2018 that eliminates the requirement of foreign companies to "have one or more UAE national partner" that owns "at least 51 percent of the company's capital" (ibid). According to Mellahi et al. (2011, 407), easing legal rules that limits FDI opportunities increases the amount of FDI inflows. In fact, countries that earlier liberalized their foreign investment laws, such as Turkey, Egypt, and Tunisia who removed entry barriers and created a climate better suited for foreign investment, experienced the highest percentage of FDI regional inflow by 34% in 2007 (ibid).

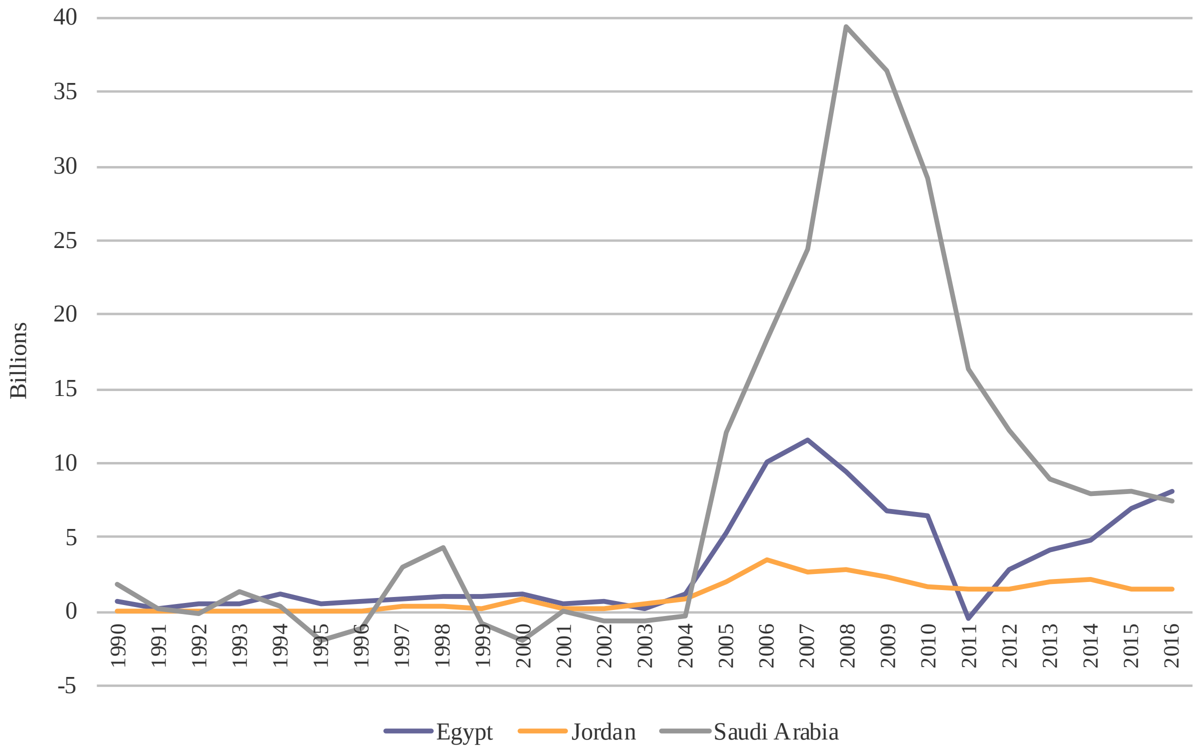
The growth of regional FDI inflows depicted in Figure 1. suggests that foreign businesses are investing in Middle Eastern markets, making the propensity to lobby a much more probable

[10] In Tunisia, after days of protest and the unwillingness of the Tunisian army to retaliate against the protestors, Zine el-Abidine Ben Ali's regime was overthrown and the ruler fled to Saudi Arabia (Dalacoura 2012, 64). This political victory ignited the passion of protestors in Egypt, which soon led to Egyptian President Hosni Mubarak to step down (ibid).

phenomenon (Drutman 2015, 49-65, 194; Mellahi et al. 2011, 407-408). In fact, within the Arab world generally, FDI inflows totaled $30.8 billion dollars in 2016, an increase of twenty-five percent from the previous year. FDI inflows for the three country case studies (from 1990 to 2016) used within this thesis are observed within Figure 1. below.

From 1990 to 2004 FDI inflows for Egypt, Jordan, and Saudi Arabia remained relatively low, with a brief spike in Saudi from 1996 to 1999. FDI inflows for the three countries were nonexistent in 2004, but experienced rapid growth (especially Saudi, reaching close to $40 Billion between 2007 and 2008) until 2008. Since 2008, each country's FDI inflows have continued to decline, with the exception of Egypt. In 2011 Egypt's inflows fell to the lowest numbers they have ever been. After this brief setback, however, Egypt's FDI continued to grow. In 2016 Egypt's inflows superseded those in Saudi Arabia for the first time since 2004 (Egypt having about $8 Billion and Saudi about $7 Billion).

Figure 1. Foreign Direct Investment: Net Inflows (BoP, current US$)



Informal Structures in the Middle East

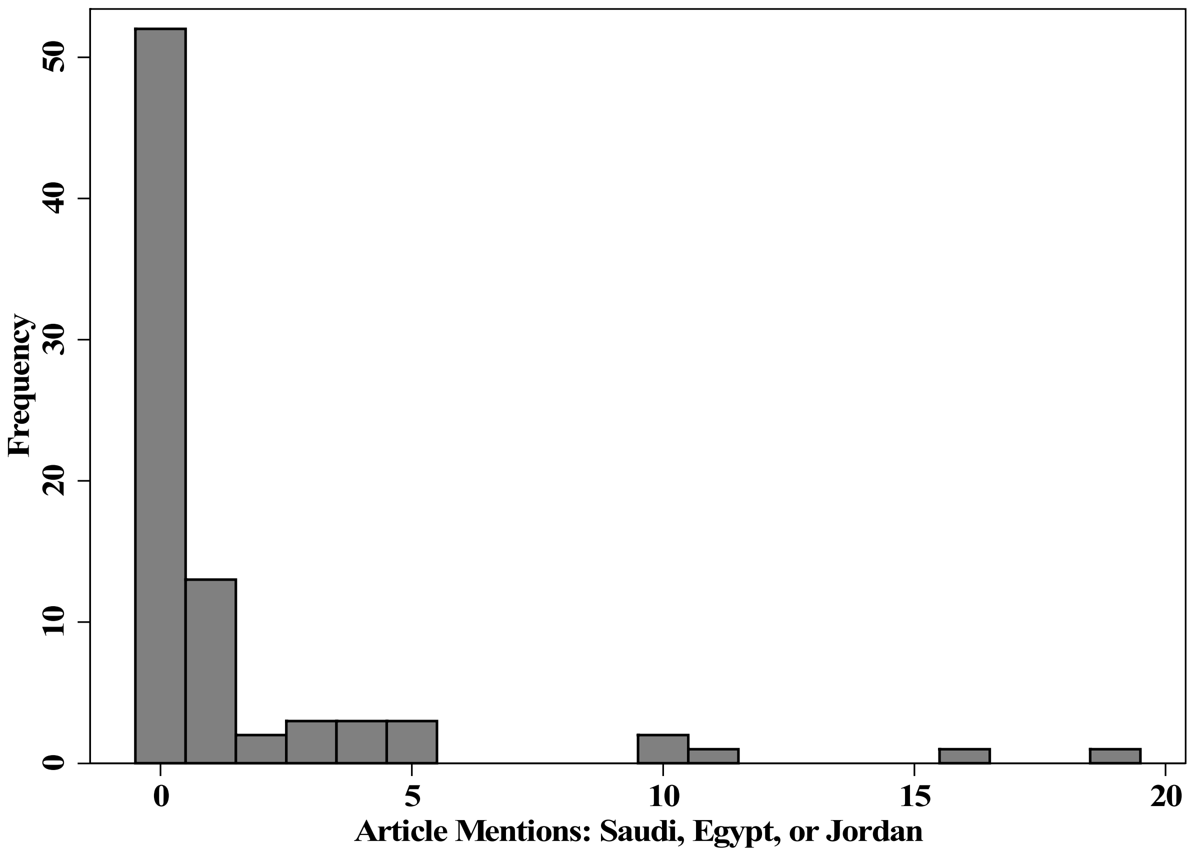
Critics argue (Hollyer and Wantchekon 2012), that because autocratic governments are not elected they cannot be held accountable by the public for their actions, which makes material incentives the primary motivation for officials to engage with foreign businesses. This view, however, further supports that businesses are necessary for governments to accomplish certain objectives, such as diversifying (or advancing) their economies and lowering unemployment rates (Kennedy 2009, 198). Without businesses these government objectives cannot be accomplished, therefore corporate firms should be considered essential political allies.

This section begins by evaluating the descriptive evidence from a sample of newspaper articles searched using Factiva's archived publication software, including the New York Times, Financial Times, The Wall Street Journal, Foreign Affairs, and The Economist. Then, I evaluate the three country case studies (Saudi Arabia, Egypt, and Jordan) according to their political structures and give real-world examples of multinational lobbying activity within Saudi, Egypt, and Jordan.

Figure two below uses a histogram to represent the frequency of newspaper article mentions for Saudi, Jordan, or Egypt. Informal lobbying is measured by the frequency of article mentions (y-axis) and the number bins that display the grouped proportion of country mentions from zero to thirty-five (x-axis). Most of the articles, about 53, did not mention a country whatsoever and 13 articles mentioned a country at least once. The remainder of the categories have only one or two articles with country mentions.[11] Since most articles have zero country mentions the data are over-dispersed with zeros, causing the categories to skew left. These factors suggest there is large variation amongst these data and necessary to use a zero-inflated negative binomial regression model to account for the over dispersion of zeros in the data, discussed in the details of Chapter Three.

[11] Specifically, there is only one article for each category with 2, 11, 16, and 19 mentions of country name and there are two articles each for articles with 3, 4, 5, and 10 mentions of country names.

Figure 2. Lobbying in Informal Arenas: Saudi, Egypt, and Jordan, 2008-2016



Saudi Arabia

The hereditary monarch serves as both the chief of state (the King) and head of government (the Prime Minister) of the sovereign Arab Islamic State of Saudi Arabia (SAIGA Resolution, 2). Within Saudi Arabia, the legislative branch is made up of a unicameral Consultative Council with 150 seats that are appointed by the monarch for 4-year terms (ibid).

Saudi policy on foreign investments has been significantly liberalized since the Foreign Investment Act was established in 2000. This key piece of legislation, allowing foreign companies to conduct business in Saudi without having to establish a local partner, was the first of many that influenced the behavior of foreign businesses in the country (UNCTAD).[12] Since then, many foreign investment laws have shaped how foreign businesses conduct themselves in Saudi. For example, in 2011, foreign residents were allowed to purchase and own personal property; in 2015 the government granted foreign businesses access to the Tadawul, the Saudi stock market; in 2016 foreign investors the wholesale and retail trading sectors began allowing foreign companies to own 100 percent of their Saudi companies, and finally, in 2017, the government extended the 100 percent foreign ownership rights to firms in the engineering sector (ibid).

Firms (either national or foreign) wanting to start a business in Saudi must first apply (and be approved) for a license[13] from the Saudi Arabian General Investment Authority (SAIGA), which resides under an elite Board of Directors (SAIGA Resolution, 2). Applications are reviewed and signed by the Governor of SAIGA[14], which typically takes about 30 days to complete. Once firms receive their approved application, they are free to conduct business but are governed by the rules and regulations established by the Foreign Investment Act.

The first example of lobbying in Saudi involves the American company Uber. In efforts to expand their ride-sharing industry to global markets, the San Francisco-based company Uber launched operations in the Saudi capital of Riyadh in 2014 after the country invested 3.5 billion into the firm (Kerr 2016, 1). When Uber began operations in Saudi it caught backlash from local cab drivers and also women who believed the move was calculated to support the ban on female drivers in the country. Most recently however, the company began enrolling female drivers for an addition to their app that is exclusively for women. Uber's activity seems to align quite nicely

[12] Prior to the 2000 Foreign Investment Act (the Act) foreign companies were required to take local business partners (UNTCAD).
[13] A SAIGA-issued approval to practice a certain activity "within the ambit of its mandate on a permanent or a temporary basis" (SAIGA Resolution, 2).
[14] Currently the Governor of SAIGA is Dr. Majid A. Al-Qasabi (SAIGA Resolution, 2).

with the status quo of policy supported by the government, which is different from typical status quo defenders that lobby in the US when policy status quos are threatened.

The next example took place in 2016, when McKinsey & Co. consultants assisted Saudi Prince Mohammed Bin Salman in a plan to "wean the country off its oil dependence" (Spindle et al. 2016, 1). McKinsey & Co. is a global business management consultant firm based in Dallas Texas that studies "markets, trends, and emerging best practices in every industry", according to the company's official website (McKinsey&Company). The most significant political transformation that occurred under the professional guidance of McKinsey & Co. was replacing Ali al-Naimi, Saudi's oil minister since 1995, with Khaled al-Falih who would lead the new Energy, Industry, and Natural Resources Ministry (Ghafar 2016, 1).

The last example of business lobbying in Saudi occurred in 2010 after one of the largest arms deals ever approved by America was awarded to the Kingdom of Saudi Arabia. The US and Saudi brokered a $60 billion-dollar 10-year arms deal for fighter jets and military helicopters that some believe was intended to win Arab allies against Iran (Entous 2010, 1). The American companies set to fulfill this order include Lockheed Martin Corp, Raytheon Co., Boeing, and United Technologies (ibid). Securing a government defense contract does not require lobbying, but a relationship is inevitably established when information is exchanged.

Egypt

The head of state in Egypt is the President and the head of government is the Prime Minister. The president is elected by an absolute majority and serves 4-year terms, whereas the prime minister is appointed by the president and approved by the House of Representatives (ibid). The legislative branch is governed by a unicameral House of Representatives that serves 5-year terms (with 596 seats). House members are chosen by three different methods of selection. First, 448 members are directly elected through an individual candidacy system, 120 members are elected through party-list constituencies by a simple majority, and finally, the remaining 28 members are chosen by the president (ibid).

Egypt significantly eased foreign investment laws in 2010 by implementing the Public Private Partnership Law that allows private companies to invest and develop government-issued contracts (UNCTAD). Additionally, in 2017 the Egyptian President signed the Gas Market Activities' Regulatory Law that allows private companies to develop, invest, and import oil and gas into the country. This reform is most significant because it abolished the state's long-established monopoly on natural gas while also encouraging regional competition in an industry that is primarily owned and operated by Arab governments throughout the Middle East (ibid).

Foreign and domestic firms wanting to establish themselves as Egyptian companies must apply to the Companies Department of the General Authority for Investment and Free Zones (GAFI) (Baker & McKenzie 2016, 6). Once GAFI has approved the firm's business license their corporate activities must adhere to the legal frameworks of two laws: Egypt's Companies law (1981) and Investment law[15] (1995).

The first example of informal lobbying in Egypt involves Gilead Sciences, an American biopharmaceutical company based in California. In 2015, the company negotiated a deal with the Egyptian government to help combat rising cases of hepatitis C. Gilead agreed to sell sofosbuvir[16] to the Egypt for around $10 a pill but required the Egyptian government place harsh restrictions on pharmacies selling the drug to prevent it being sold on the "black market" (McNeil and El-Zohairy 2015, 1). Eligible government pharmacies dispense sofosbuvir to

[15] The original 1997 Investment Incentives Law was designed to encourage domestic and foreign investment in targeted economic sectors and to promote decentralizing industries away from the Nile Valley. This law essentially allows 100 percent foreign ownership of investment projects within Egypt (Baker & McKenzie 2016, 6).

[16] Formally sold as Sovaldi in the US for about $1,000 per dose, is a drug that, when taken with the drugs ribavirin and interferon, typically cures hepatitis C infection in about 12 weeks (McNeil and El-Zohairy 2015, 1).

Egyptian citizens for free but are required by law to make all patients turn in old bottles before receiving a new one. In addition to these stipulations, before individuals are allowed to leave with their fresh prescription they must open the bottle and take the first pill in front of the pharmacist (ibid).

In 2016, just two short years after entering the Egyptian market, the ride-sharing app Uber invested $500 million in Egypt's branch to continue growing its market (The Washington Post 2011, 1). In March 2018, however, after a group of Cairo taxi drivers filed a suit against the company a court ordered Uber to cease operations in Egypt for illegally using cars to operate as private taxis (Reuters Staff 2018, 1). After appealing the case, the California-based company was allowed to continue operations a few days later. The appeal was granted under the condition that Uber would work alongside the Egyptian government to create a bill for regulating their licensing and ride-sharing data (ibid). Specifically, the new law requires Uber keep "user data for 180 days and share it with authorities" upon request (ibid). Essentially, this bill allows the Egyptian authorities to have live access to passenger and trip information for all users. This is problematic because the Egyptian government was found to have spied on activists during the 2011-2012 Arab uprisings that led to violations of human rights laws (Beaumont 2011, 1; Wong 2013, 2).

The third and final example of business lobbying in Egypt involves two US oil companies, Apache and Shell. Responding to one of its worst energy droughts in history, the head of Egypt's state oil company signed a deal with an executive from Apache Corporation who also happens to chair the board of Shell in Egypt (Reuters Staff 2014, 1). After months of negotiations and detailing incredible amounts of critical information, Egypt signed its first contract to extract shale gas via hydraulic fracturing, better known around the world as fracking[17] (ibid). The information Shell provided to the Jordanian government influenced their policy decision on fracking, which is consistent with lobbying behavior in the West.

Jordan

The government of Jordan functions as a parliamentary constitutional monarchy, whereby the monarchy is assumed hereditarily, the prime minister is appointed by the monarch, and the legislative branch is a bicameral National Assembly (UNCTAD). The National Assembly is made up of the House of Notables (65 seats appointed by the monarch for 4-year terms) and the Chamber of Deputies (130 seats elected through open-list proportional representation vote for 4-year terms[18]).

Jordan's foreign investment policy experienced a significant change in 2016 when the country enacted the Investment Fund Law. Essentially, the fund allows the government to partner with foreign or local firms to invest, exclusively own, and develop public projects like the national railway system, the electricity connectivity system, and pipelines for transporting crude oil (UNCTAD). The Fund is overseen by a board of directors that consists of the Prime Minister; the Minister of Planning and International Cooperation; the minister of industry, trade and supply; the ministers of finance, energy and mineral resources, a representative from the investors, and three members appointed by the Council of Ministers. Then, in 2017, the Jordanian Investment Commission eased committee approval requirements, licensing procedures, and reduced the time it takes to register (ibid).

[17] "Hydraulic fracking uses water, sand and trace chemicals under high pressure to crack open deep deposits of shale oil and natural gas" (Herman 2013, 2).

[18] 15 of these seats are specifically reserved for women and 12 of the 115 seats must be filled by Christian, Chechen, and Circassia candidates.

If a foreign firm[19] wants to enter the Jordanian market, they must adhere to the unique registration and legal requirements established by the government. Foreign firms are required to complete a Business Venture Licensing Form and a Company Registration Application for the Companies Registry of the Ministry of Trade and Industry (PFK 2016, 19; The World Bank: Jordan 2017). The licensing and registration process are serviced by the Companies Control Department, an independent department created by the Ministry of Trade and Industry in 2003 (Jordan.gov).

In a 2014 joint venture to supply Jordan with natural gas, Noble Energy of the US and Israel's Delek company negotiated a $15 billion dollar fifteen-year deal with the Jordanian government. These negotiations required Noble Energy to meet with both Israeli and Jordanian government officials to supply essential information about the proposed project. Specifically, Noble (together with Delek, the state-owned energy company) supplied the Israeli government with key information about the project in order to get permission to export a significant amount of Israeli energy to Jordan to cover the 3 to 4-billion-dollar cost they needed to develop the Leviathan gas field (Reed 2014, 1).

The second example of lobbying activity in Jordan involves Royal Dutch Shell corporation, the international oil and gas mega giant. In a grand strategy to build new markets for natural gas and remain a competitive contender, Shell has been investing and developing natural gas import terminals and other infrastructure projects to help distribute the fuel (Kent 2016, 1). A few of these natural gas projects were built in Jordan. During this time, Shell worked closely with the Jordanian government while building the new LNG importing facilities (ibid).

[19] Within Jordan, an operating foreign company is classified as a non-Jordanian entity registered outside the country with headquarters in another country (PFK 2016, 15).

The last example of lobbying in Jordan took place in 2008 during the first year of the most recent economic recession in American (Langley 2008, 1). There was not a state that experienced the financial struggle more than Michigan, which had the highest unemployment rate in the country (about 10%) that was steadily rising. After unsuccessfully lobbying US legislators for financial bailouts to rescue her state's auto industry, Governor Jennifer Granholm directed her efforts toward the Middle East in a visit to Jordanian's King Abdullah II. The former Governor of Michigan met with the Saudi King to encourage his investment in the state (ibid). In addition to Governor Granholm's visit to Jordan, then President and CEO of the Michigan Economic Development Corporation simultaneously lobbied political leaders in Israel and Jordan to encourage companies to invest in the struggling state (Boyd 2008, 1).

Currently, in Saudi Arabia, Egypt, and Jordan there are no laws in place that regulate lobbying, therefore it does not require reporting. However, the evidence provided by newspaper articles reveals that lobbying does occur in countries with informal arenas. The examples provided in this section support that autocratic governments can, and do, engage in traditionally Western lobbying relationships with US businesses. This suggests that corporate lobbying within informal structures should be further investigated to understand how this activity influences policy.

Conclusion

In total, there are a few factors that suggest Western-style lobbying activities are embraced by US companies and government leaders within autocratic states. First, because foreign governments themselves lobby in America it makes them privy to the practices and procedures of US lobbying. Second, personal and business ties that foreign government leaders share with American companies are maintained by information product exchanges. The evidence provided in this chapter supports that American companies and autocratic governments in the Middle East engage in meetings, exchange information, and share quid pro quo relationships that imitate lobbying in America. Although the literature on business lobbying in America is robust, its investigation within informal structures remains sparse. Perhaps, scholars are reluctant to study how nonstate actors lobby to influence policy within informal structures because there is no official reporting system for this activity, which makes it much more difficult to measure. Formal arenas, on the other hand, have registry and other transparency requirements that mandate this activity be reported to curtail government corruption (discussed in the details of Chapter Three). Typically, formal arenas like the US allow scholars to collect data and information from official government documents. While this thesis is supported by evidence from newspaper articles and not official government documents, its primary goal is to identify how nonstate actors lobby in informal (unregulated) structures.

CHAPTER THREE

DATA, METHOD, AND ANALYSES

Introduction

This chapter explains the research hypothesis, variables, model and methods used to classify and code the data. To test my hypothesis, that the more a business lobbies in the US, the more they will lobby in countries with informal arenas, I operationalize Lobbying Disclosure Act (LDA) reports, business profiles, and newspaper articles from 2008 to 2016. These data are then evaluated based on their descriptive and empirical results. Furthermore, the descriptive results suggest that four companies (Noble Energy, General Motors, Merrill Lynch, and Cargill Inc) lobbied in Saudi, Egypt, and Jordan significantly more than all others. Furthermore, the most important finding from the descriptive analysis reveals that when a company meets with a king, prince or head of government, then they will also have business contracts and negotiations within informal arenas as well. Lastly, although the findings of the negative binomial regression model require are not found to be statistically significant, the qualitative analysis offers important results for scholars who study international relations and public policy.

Methodology

In this section, the data used to test my hypotheses are introduced and then explained according to the lobbying arena they represent. The first section uses LDA data to examine the formal US arena, where lobbying activity is regulated, and the second portion relies on newspaper articles to identify informal, unregulated, structures that are lobbied abroad.[20]

To test my hypothesis, I operationalize LDA reports, business profiles, and newspaper articles from 2008 to 2016. The unit of analysis for this research project is the multinational

[20] See the Codebook in the Appendix of this chapter for variable details listed in this section.

company, the independent variable is the formal US arena that constrains lobbying activity with legality, and the dependent variable represents informal structures where lobbying is not regulated, specifically those in the Middle East.

The formal US arena is identified through LDA reports and non-bribery lobbying in the Middle East is determined by newspaper articles. I use both LDA report and newspaper article mentions to draw on what we know of the formal American structure to study informal arenas in the Middle East. This is because we know a lot about lobbying in America but lack scholarly investigation into lobbying outside these Western frameworks.

The United States: A Formal Arena

The qualitative information is collected from The Center for Responsive Politics (opensecrets.org[21]) and the Lobbying Disclosure Act (LDA) database (The United States Senate, 2016). Lobbying is identified quarterly using keyword searches (of country names) located in the specific issue section of LDA reports. Specifically, I identified mentions of seventeen Middle Eastern country names[22] (including Saudi Arabia, Egypt, and Jordan) as keywords in a content analysis of the specific issue section within LDA reports[23] to determine whether corporate interests lobbied the US between 2008 and 2016.[24]

I use a larger sample of countries to identify lobbying in the formal US structure because LDA reports do not require lobbyists to identify the foreign countries relevant to their client's lobbying intent, therefore a larger sample of countries will better reflect the companies with

[21] Which include Lobbying Disclosure Forms defining the specific lobbying issue as foreign policy in at least one of the seventeen Middle Eastern states used within the research (The Center for Responsive Politics 2016).
[22] The key-word content analysis of LDA reports identified mentions of seventeen countries within the Middle East: Turkey, Iran, Israel, Palestine, Saudi Arabia, United Arab Emirates (UAE), Iraq, Syria, Lebanon, Yemen, Qatar, Jordan, Kuwait, Bahrain, Oman, Cyprus, and Egypt.
[23] It should be noted, however, that because LDA Reports are not required to define the exact intention of lobbying, the research assumes this percentage would be higher if it were legally required to reveal the exact intent of lobbying within LDA Report filings.
[24] LDA reports began using the specific issue section in 2008, before this, however, lobbyists were not required to describe the intent of their lobbying behavior within a specific issue section because it did not exist (U.S. House of Representatives 2018).

interests in the region. From here, I focus on informal arenas in Saudi, Egypt, and Jordan to identify lobbying leading up to the 2017-billion-dollar business and industrial zone project that requires collaborations with corporations from around the world (Reuters 2017).

I began by sampling a population of 1,151,633 LDA reports to identify lobbying in the US that focused on issues about seventeen Middle Eastern countries, including Saudi, Egypt, and Jordan. This data was collected from Lobbying Disclosure Act reports published by The Center for Responsive Politics (opensecrets.org) and the Lobbying Disclosure Act (LDA) database (The United States Senate, 2016).

All LDA reports that mention one of the seventeen countries and are filed on behalf of a multinational business client, are included in the data collection. These reports identify the lobbying firm, client name, targeted government agency, timeframe (published quarterly), and the general intent of lobbying (within their specific issue section). Since lobbying was identified using LDA publications, all reports that mention a relevant country are coded 1, all others are coded zero.

Lobbying in Informal Structures: Saudi Arabia, Egypt, and Jordan

Using Factiva's business profile database, I confirmed a list of 81 multinational companies[25] that lobbied the US government about issues in seventeen Middle Eastern countries from 2008 to 2016. These company names/titles are used as key-words (such as "Shell Corporation" or "Boeing") in a content analysis of newspaper articles to identify corporate lobbying within informal structures that would require a filed LDA report in the US. It is important to clarify why these data are collected from newspaper reports, versus government documents, to account for corporate lobbying. This is because typically, scholars generate

[25] Find full names of companies within the Company List located in Appendix 3.

lobbying data from official governmental documents that lobbyists are required to report within countries that regulate their behavior (Mahoney 2008, 29). However, because the three countries under investigation do not regulate this industry, corporate lobbying activity is determined by descriptive media reports published by The New York Times, Financial Times, The Wall Street Journal, Foreign Affairs, and The Economist.

Lobbying within informal structures is determined through newspaper article mentions from 2008 to 2016. Newspaper articles were searched using Factiva's archived publication software, and include all issues from the New York Times, Financial Times, The Wall Street Journal, Foreign Affairs, and The Economist. Specifically, if an article mentioned a foreign company lobbying in an informal arena (identified through five categories of subjective_intensity), it was coded 1, others were coded zero.

Newspaper articles were coded based on their relevancy, mentions of Saudi Arabia, Egypt, or Jordan, and subjective intensity. An article is deemed relevant, and coded 1, if it mentions a foreign company lobbying within a country that does not regulate this activity.[26] Also, I included an additional variable to account for articles that specifically mention lobbying in Saudi, Egypt, and Jordan. If an article mentioned one of these three countries it was coded 1, others are coded zero.

Lastly, a 5-point scale for the subjective intensity of lobbying activity (within informal structures) is identified for all relevant articles.[27] The subjective intensity scale ranges from least intense (1) to most intense (5) to reflect an activity's ability to influence policy in some

[26] Since only 20 countries currently regulate lobbying, the research findings will have relevance for most countries in the world because they do not have laws in place to account for lobbying activity.
[27] As discussed in chapter two, Saudi, Egypt and Jordan each have laws that require foreign-owned companies to provide information to government officials that is similar to the information these firms provide legislators when they lobby in the US.

capacity.[28] I account for the subjective intensity of the articles to quantify lobbying activity.[29] The scale of intensity includes mentions of business negotiations (1), contracts (2), joint ventures with local partners (3), meeting with government officials (4), and meeting with a king, prince, or equivalent head of government (5).

Descriptive Results

Informal Structures in the Middle East

Table 1. below represents the number of sampled articles for each of the 81 companies included in the study. Between 2008 and 2016 there were a total of 1,848 relevant newspaper articles for all 81 companies. I coded an original dataset for a quarter, or 462, of these articles. The mean number of articles for all companies is about 6, therefore, only 17 companies (some 21%) represent 81% of the total sample of articles.

Merrill Lynch (50) has the highest number of reports, about 10.82% of all sampled articles, while fifty-two of the 81 companies (some 64%) in my list, had only 1 publication each. Therefore, only 29 (or 36% of) companies had two or more articles.[30] This suggests that Merrill Lynch is an outlier because it had significantly more articles than the other companies included in the dataset.

[28] See Codebook in Appendix 1 for variable names and definitions.
[29] Although we cannot identify the behavior lobbyists rely on more to advance the policy goals of their clients, in tracking the amount of lobbying, and using research from the Center for Responsive Politics, allows researchers to identify the extent of lobbying for each client, as well as the amount of money they spend on this activity (The Center for Responsive Politics 2016).
[30] These results suggest that I should incorporate more variables into my study (either more country case studies or newspaper article publication types) or conclude that newspaper articles are not the best variable to collect information that explains how companies lobby within informal structures.

Table 1. Company List

Merrill Lynch	50	Exelon Corp	1	Intelsat General	1
Shell Oil	49	Louis Dreyfus Co	1	ABF Freight	1
Noble Energy	39	Festo Corp	1	Interlease Inc	1
General Motors	37	Middle East Petro	1	Jeeran Holding Co	1
American Airlines	37	CNH Industrial	1	Hawker Beechcraft Corp	1
Boeing Co	30	CITGO Petroleum	1	AbbVie Inc	1
ConocoPhillips	25	AstraZeneca	1	Herbalife Int	1
Lockheed Martin	21	Paramount Farms	1	Tyco Electronics	1
Hewlett-Packard	15	Genworth Finance	1		
Procter & Gamble	14	Royal Wine Corp	1		
Chevron Corp	12	Chubb Corp	1		
Caterpillar Inc	8	Energy Systems	1		
Delta Air Lines	8	Hanesbrands Inc	1		
Anadarko Petro	7	Lyondell Chemical	1		
United Tech	7	URS Corp	1		
US Airways	7	BP America	1		
Occidental Petro	6	Viacom Inc	1		
Cisco Systems	5	Mirant Corp	1		
Apache Corp	5	Blue Diamond	1		
Marathon Oil	4	Motley Rice LLC	1		
Coca-Cola Co	4	Siemens Corp	1		
Bristol-Myers Squibb	3	Dial Corp	1		
		Sigarms Inc	1		
Halliburton Co	3	Pacific Coast Feather	1		
Pfizer Inc	3				
Chrysler Group	2	Solvay Chemicals	1		
TIAA-CREF	2	Clear Channel	1		
Eli Lilly & Co	2	Aegis Insurance	1		
Gap Inc	2	Rhodia Inc	1		
Honeywell Int	2	Underwriters Labs	1		
Orbital Sciences	1	SAIC Inc	1		
Deloitte LLP	1	Deere & Co	1		
Seaboard Corp	1	Aerojet-General	1		
Erickson Inc	1	Kaman Corp	1		
Monsanto Co	1	Aeroflex Inc	1		
Exelis Inc	1	Hormel Foods	1		
Smithfield Foods	1	Textron Inc	1		
Cargill Inc	1	ILC Dover	1		

The company descriptive results from *Figure 2.* (in Chapter Two) are listed below in *Table 2.* We can infer that General Motors (19.00) had the most newspaper article mentions and nine companies (Tyco Electronics, Delta Air Lines, Cisco Systems, Cargill Inc, Solvay Chemicals, Hewlett-Packard, Monsanto Co, American Airlines, and Deloitte LLP) equally represent the least number of mentions (1.00). Since GM has an average of 19.00 article mentions, and the mean total of mentions for all 25 businesses is 4.60, it is clear that General Motors is an outlier and lobbies in the three countries significantly more than the average firm.

Table 2. Top Lobbying Clients in Saudi, Jordan, and Egypt, 2008-2016

Client	**About_sje**
General Motors	19.00
Noble Energy	16.00
Boeing Co	11.00
Merrill Lynch	10.00
Shell Oil	10.00
ConocoPhillips	5.00
Lockheed Martin	5.00
United Technologies	5.00
Anadarko Petroleum	4.00
Chevron Corp	4.00
Apache Corp	4.00
Procter & Gamble	3.00
Coca-Cola Co	3.00
Occidental Petroleum	3.00
Bristol-Myers Squibb	2.00
Halliburton Co	2.00
Tyco Electronics	1.00
Delta Air Lines	1.00
Cisco Systems	1.00
Cargill Inc	1.00
Solvay Chemicals	1.00
Hewlett-Packard	1.00
Monsanto Co	1.00
American Airlines	1.00
Deloitte LLP	1.00
Mean	**4.60**

Table 3. below identifies the companies with the most article mentions about business negotiations within informal structures. Overall, only 22 of the 81 companies (or 27.16%) had business negotiations. Noble Energy (28.00) have the most mentions for negotiations, while nine companies (Hewlett-Packard, Deloitte LLP, Coca-Cola Co, Cisco Systems, Delta Air Lines, Solvay Chemicals, Monsanto Co, Smithfield Foods, and Gap Inc) have the least number of mentions (1.00).

Table 3. Article Mentions of Negotiations by Company, 2008-2016

Client	**Negotiations**
Noble Energy	28.00
Shell Oil	27.00
Lockheed Martin	12.00
Boeing Co	9.00
General Motors	8.00
United Technologies	4.00
Merrill Lynch	4.00
Anadarko Petroleum	3.00
Pfizer Inc	3.00
Apache Corp	3.00
ConocoPhillips	3.00
Marathon Oil	2.00
Occidental Petroleum	2.00
Hewlett-Packard	1.00
Deloitte LLP	1.00
Coca-Cola Co	1.00
Cisco Systems	1.00
Delta Air Lines	1.00
Solvay Chemicals	1.00
Monsanto Co	1.00
Smithfield Foods	1.00
Gap Inc	1.00
Mean	**5.32**

The companies listed in *Table 4.* below represent the top 25 companies with business contracts in countries with informal structures. General Motors and Boeing Co (19.00) have the most business contracts, and nine companies (Gap Inc, Cargill Inc, CNH Industrial, Tyco Electronics, Mirant Corp, Smithfield Foods, American Airlines, Solvay Chemicals, and Monsanto Co) have the least number of contract mentions (1.00). Chevron Corp (6.00) has the mean number of mentions across the company mentions, which means that General Motors and Boeing are the outliers since they had more than three times the average number of business contracts.

Table 4. Top 25 Clients with Business Contracts in Informal Structures, 2008-2016

Client	**Contract**
General Motors	19.00
Boeing Co	19.00
Shell Oil	16.00
Merrill Lynch	15.00
Noble Energy	15.00
Lockheed Martin	15.00
ConocoPhillips	11.00
Chevron Corp	6.00
United Technologies	4.00
Occidental Petroleum	4.00
Procter & Gamble	4.00
Anadarko Petroleum	3.00
Pfizer Inc	3.00
Apache Corp	3.00
Bristol-Myers Squibb	2.00
Halliburton Co	2.00
Gap Inc	1.00
Cargill Inc	1.00
CNH Industrial	1.00
Tyco Electronics	1.00
Mirant Corp	1.00
Smithfield Foods	1.00
American Airlines	1.00
Solvay Chemicals	1.00
Monsanto Co	1.00
Mean	**6.00**

Merrill Lynch (4.00) has the most mentions in *Table 5.*, which represents the average number of article mentions about companies that partnered with local firms. Six out of the nine companies (United Technologies, Lyondell Chemical, Halliburton Co, Tyco Electronics, Lockheed Martin, and Noble Energy) have the least number of article mentions (1.00). The mean number of mentions across these companies is 1.56, therefore it can be determined that Merrill Lynch is an outlier and does not represent the typical case of companies in *Table 5*.

Table 5. Partnered with Local Affiliate, 2008-2016

Client	**Local_partner**
Merrill Lynch	4.00
Shell Oil	2.00
Boeing Co	2.00
United Technologies	1.00
Lyondell Chemical	1.00
Halliburton Co	1.00
Tyco Electronics	1.00
Lockheed Martin	1.00
Noble Energy	1.00
Mean	**1.56**

The data in *Table 6.* represent the average number of article mentions for business meetings that involved a government official from an informal arena. The data listed in *Table 6.* reveal that only 12 of the 81 companies, some 14.8%, met with government officials from informal structures, which suggests that this activity is exclusive. Noble Energy and Lockheed Martin (3.00) have the most mentions and five companies (Cisco Systems, General Motors, Tyco Electronics, Cargill Inc, and Shell Oil) have the least (1.00). Since the average number of mentions about these meetings is 1.75, it is clear that this company list does not have any significant outliers.

Table 6. Meeting with Government Official from Informal Arena, 2008-2016

Client	**Meetinggovernmentofficial**
Noble Energy	3.00
Lockheed Martin	3.00
Merrill Lynch	2.00
ConocoPhillips	2.00
Bristol-Myers Squibb	2.00
Coca-Cola Co	2.00
United Technologies	2.00
Cisco Systems	1.00
General Motors	1.00
Tyco Electronics	1.00
Cargill Inc	1.00
Shell Oil	1.00
Mean	**1.75**

Out of the 81 companies only 5, about 6.17%, companies had interactions with a king, prince, or equivalent head of government. *Table 7.* below identifies the five companies according to the mean total number of their article mentions. The mean number of mentions between the five companies is 1.80, with Noble Energy and Shell Oil having the most mentions (3.00) and General Motors, Anadarko Petroleum, and Coca-Cola Co equally sharing the least number of mentions (1.00). *Table 7.* has the fewest number of company mentions across each of the five variables, therefore it is the most exclusive category of subjective_intensity.

Table 7. Meeting with a King, Prince, or Head of Government

Client	**Meeting_kph**
Noble Energy	3.00
Shell Oil	3.00
General Motors	1.00
Anadarko Petroleum	1.00
Coca-Cola Co	1.00
Mean	**1.80**

Informal Arenas: Quantitative Analysis

Hypothesis: The more a company lobbies the formal American arena, the more they will lobby informally in Saudi, Egypt, and Jordan.

Does engaging in more formal lobbying in the US lead to more informal lobbying abroad? Since the descriptive statistics tell us that the data are over-dispersed with zeros, meaning the variance is larger than the mean, I must use a zero-inflated negative binominal regression model to account for the excessive number of zeros within the data (Introduction to SAS). [31]

Table 8. lists the results of the model that tests whether the number of LDA reports published in a given quarter (the independent variable) had an effect on the number of articles that mention lobbying within Saudi, Egypt, or Jordan (about_sje, the independent variable). The z test statistic for the predictor about_sje[32] is (0.02/0.03) = 0.67 with a p-value of 0.49. The same z test statistic for companies in the certain zero group are (the results of the zero-inflated statistics) about_sje (-15.71/6521.83) = 0.00 with a p-value of 0.99. The p-value for the number

[31] This model uses a two-step process to interpret the data, the first must predict the membership in two groups *always zero* and *not always zero*, and second predicts the count in the *not always zero* group (Introduction to SAS). This will account for the over-dispersed zeros within the subjective intensity article data.
[32] The variable about_sje represents articles that mention lobbying within Saudi, Egypt, or Jordan. See Code Book in APPENDIX 1 for additional variable information.

of articles about Saudi, Jordan, and Egypt (about_sje) is more than the 0.05 statistically significant threshold, therefore, I must reject my hypothesis and accept the null.

The data used to find the results listed in *Table 9.* were tested to determine whether the number of country-relevant LDA reports published in a given quarter predicts the amount of lobbying a company will employ within Saudi, Jordan, and Egypt. Since the results represent p-values above the acceptable 0.05 level for statistical significance, I conclude that the number of quarterly reported LDA issue reports does not predict the amount of corporate lobbying within informal structures.

Table 8. Maximum likelihood estimates of the ZINB regression model

Variable	About_sje			Zero-inflated part		
	Estimate (SE)	P >	95% CI	Estimate (SE)	P >	95% CI
LDA reports	0.02 (0.03)	0.49	-0.04 | 0.08	-15.71 (6521.83)	0.99	-12798.28*

(SE): Standard Error; P >: p-value; 95% CI: 95% confidence intervals; *CI (-12798.28|12766.85)

Discussion

Overall, this chapter defined the research variables, identified how they are measured, evaluated the descriptive findings, and assessed results for the negative binomial regression model used to test the hypothesis. Although the results did not find a statistically significant relationship between lobbying in formal and informal structures, the findings highlight an important and understudied phenomenon within the field of political science.

The histogram within *Figure 1.* reveal the over-dispersion of zeros within the relevant newspaper articles. This confirmed the type of model needed to test for a statistically significant relationship between formal (the independent variable) and informal (the dependent variable) lobbying structures. Moreover, four of the 81 companies were the most active companies across the five categories of subjective intensity. Noble Energy, General Motors, Merrill Lynch, and Cargill Inc were the top companies in at least one of the five categories of subjective intensity. Additionally, another important takeaway from the descriptive findings is that when a company meets with a king, prince or head of government they will also have business contracts and negotiations within informal arenas as well.

Finally, although the results of the zero-inflated negative binomial regression model reveal that I must accept the null and thereby reject my hypothesis, the descriptive findings yield new and important results for the field of political science. Specifically, that lots of US companies are involved in business agreements with Middle Eastern governments, but only a few have the opportunity to partner with local affiliates, meet with local foreign officials, and discuss business opportunities with a king, prince, or head of government. Therefore, we can determine that lobbying within informal structures does grant access to lawmakers, but admission is a rare and exclusive luxury for US businesses in the Middle East.

CHAPTER FOUR

LIMITATIONS, IMPLICATIONS, AND ADDITIONAL INFORMATION

Introduction

The purpose of this thesis is to help scholars and policymakers think about issues that evolve when US businesses lobby in unregulated arenas. Chapter One identified how foreign governments engage in lobbying themselves and have personal and professional ties with US businesses, which makes them more susceptible to corporate lobbying. Then, Chapter Two revealed three examples of corporate lobbying activity for each of the three country case studies. Although the quantitative analysis in Chapter Three did not find a statistically significant relationship between companies that lobbying in the US and lobbying in informal structures, its descriptive results show that when a company meets with a king, prince or head of government, then they will also have business contracts and negotiations within informal arenas as well. Overall, because the concept of informal lobbying structures is understudied this thesis provides scholars with a foundation for approaching lobbying in informal arenas outside the traditional American and Western examples traditionally explored within political science research.

Overall, I have shown that businesses (mostly from the US) have access to government officials in America, Saudi, Egypt, and Jordan. Specifically, using descriptive examples from newspaper articles, I show that autocratic governments themselves lobby the American government and have personal and professional ties with US companies. Then, from the qualitative analysis, I find that US companies like Uber, Boeing, Gilead Sciences, Noble Energy, and Shell lobby autocratic governments. The quantitative results did not find a relationship between formal arena lobbying and lobbying informal structures, but this does not discount the fact that businesses continue to lobby autocratic governments and influence policy.

The contents of this final chapter focus on the research limitations, potential avenues for future research, and implications of this study. The first section considers the limitations of this study, such as the small number of observations. The second offers scholarly considerations for researchers interested in nonstate actors that lobby within informal structures. The final section considers both theoretical and policy implications.

Limitations

One main limitation to the findings of this study is its measure of lobbying within informal arenas, specifically, the small number of country case studies used to explain lobbying activity in informal structures. Relying on data and information from only three countries (Saudi Arabia, Egypt, and Jordan) to explain the international behavior of a class of actors can yield ungeneralizable and inconclusive results. For example, Kukull and Ganguli (2012, 1887) argue that, in order for studies to be generalizable other researchers must be able to replicate them and produce the same results. The authors note (ibid), however, that generalizability can be influenced by a study's internal validity, or the way the study was designed or conducted. To strengthen the internal validity of this study, future research can include a much larger random sample of companies, more country case studies (including countries with different government structures and regime types), and additional newspaper publication types.

Additional Factors for Scholarly Consideration

There are a few areas of concern that scholars should focus on to further develop the findings of this study. Perhaps the most important addition to this study, however, would include a discussion on the role of DC firms that provide access to foreign decisionmakers. There is a growing field of DC lobbying firms that specialize in helping companies navigate through the "political uncertainty" that deters them from entering foreign markets (Baker McKenzie 2018).

Firms like Baker McKenzie and AP consulting help their clients “bridge business cultures” and establish an understanding of the unique political barriers in the Arab world (AP Consulting 2018). Understanding the role these types of firms play in accessing and (ultimately) influencing foreign decisionmakers is not only important to the research findings in this thesis, but also necessary to understand how nonstate actors, specifically for-profit multinational corporations, influence foreign policy in informal unregulated structures.

Additionally, scholars should test the research hypotheses on a more robust set of data. Specifically, more country case studies, newspaper publications, and US companies. In total, there are 175 countries with informal structures, therefore future studies should use a larger sample of country case studies since most countries in the world, not just autocracies in the Middle East, do not regulate lobbying (Watson 2016, 2). This would ensure the data will be better suited to the research questions and, perhaps, provide more information about corporate lobbying activity in countries that do not regulate its activity.

Implications

Scholarly Implications

Using qualitative examples, I have shown that US businesses, one type of nonstate actor, do in fact lobby foreign autocratic governments within unregulated structures. This tells us that nonstate actors have become essential players to both domestic and foreign governments in that they provide specialized information to policymakers that ultimately influences policy. This is concerning because companies and other nonstate actors are not constrained by the same sovereign boundaries that internally limit the powers of domestic government leaders to issues pertaining to their state. Rather, multinational corporations are in a league of their own, playing by their own rules and norms since most states do not possess laws to regulate this professionalized industry beyond the bounds of bribery and corruption. This finding suggests that in the absence of formal law, nonstate actors will behave in their own self-interest and lobby foreign governments with informal structures (those who do not legally recognize lobbying as a profession that influences policymaking and therefore do not regulate it) even when regulations are not in place to encourage and facilitate behavioral norms. In other words, regardless of whether a state regulates lobbying, nonstate actors will still lobby decisionmakers if they feel it is necessary to accomplish their regional goals. This is especially true because lobbying is not illegal in these countries, it is simply unregulated by transparency laws.

The article examples given in Chapter 2 suggest that nonstate actors, namely US businesses, do not require formal rules to lobby autocratic governments. The descriptive evidence reveals that nonstate actors use previously learned normative behavior when lobbying foreign officials in countries that do not constrain this activity by law. This is problematic because nonstate actors continue to collaborate with governments around the world and influence policy away from the public eye, free from the accountability that transparency laws ultimately provide. Unfortunately, without the necessary transparency laws in place to monitor and ultimately constrain lobbying behavior, companies and other nonstate actors are not bound to the same limitations that lobbying reports impose thereby allowing them to influence and shape policy in the shadows.

Additionally, the newspaper article examples of lobbying in Saudi, Egypt, and Jordan suggest that autocratic governments, like Western democracies, value the specialized knowledge that nonstate actors, namely businesses, supply. Therefore, it is clear that theoretically, scholars are missing an important phenomenon whereby autocratic regimes use information provided by US businesses to create and amend policy.

There are larger implications for the study of autocratic regimes as well. This study suggests that autocrats are open to collaborating and developing relationships with US businesses similar to those formed when firms lobby in the West. This is an important finding since traditionally autocratic governments are reluctant to open their systems to Western norms, since it makes their leadership vulnerable to accountability and criticism.

Policy Implications

Generally, the main issue with lobbying that occurs within informal arenas is that there is no way of knowing how policy is influenced by US businesses. We do know, however, that lobbying in the US is known to impact policy formation (Baumgartner et al. 2009; Hall and Deardorff 2006; Drutman 2015; Thomas and LaPira 2016; and LaPira and Thomas 2017), which is why this arena is heavily regulated. Moreover, newspaper article examples confirm that American businesses operating in foreign countries also influence policy outcomes. The challenge here is understanding how lobbying influences policy when the proper regulations are not in place. For now, states continue to allow non-state actors to remain in the shadows free to influence policy by lobbying foreign leaders and government officials using non-bribery means.

Nonstate actors, specifically businesses, should be mindful of the social and political repercussions that can occur from their lobbying interactions with government officials from unregulated arenas. Without formal rules in place to help track, protect, and limit their influence, foreign firms influence Middle Eastern policy as much as they do Western policy, but only one of these can be measured for assurance. Since the qualitative analysis revealed that US businesses lobby autocratic regimes and do influence policy, firms should be conscious, and perhaps keep track, of the amount of information they provide and whether it influences the decisions of policymakers in autocratic countries.

Countries that do not have lobbying regulations in place run the risk of unknowingly endorsing corruption and bribery, especially given the fact that illegal practices continue to occur when lobbying is regulated. Further evidence from the content analysis of newspaper articles revealed that from 2008 to 2016 bribery occurred in the US, Nigeria, Egypt, China, India, and Mexico by executives from Halliburton Co., Alstom SA, Avon Products Inc., Wal-Mart Stores Inc., Alcoa Inc., and Hercules Offshore Inc. (Gold 2008, 1; Ensign and Mann 2015, 1; Curtin 2010, 1; Dezember and Searcey 2011, 1)

One of the most effective tools for combatting unethical lobbying behavior has been the implementation of transparency and registration laws. The Organization for Economic Co-Operation and Development (OECD) published a report on lobbying and transparency, that suggests transparency laws deter corrupt behavior, drawing from the experiences of Australia, Canada, Hungry, Poland, the United Kingdom and the United States (OECD 2009, 3). The OECD found that the most effective lobbying regulations were those that implemented registration requirements on lobbying activity (OECD 2009, 37).

While there are US laws in place to deter lobbyists and their clients from engaging in corrupt behavior abroad, these laws do not eliminate the influence that corporations and other nonstate actors have on policy in other countries. For example, the 1977 Foreign Corrupt Practices Act (FCPA), enforced by the US Securities and Exchange Commission (SEC) and Department of Justice, "prohibits the payment of bribes to foreign officials to assist in obtaining or retaining business", and applies to all US companies (including their employees) stockholders, and agents (sec.gov). While the FCPA is designed to deter corrupt activity, it does not adequately address the central issue with informal lobbying that allows lobbyists and their clients to influence policy abroad while remaining in the shadows undetected, which can encourage different types of normative behavior. In their 2012 study, Holman and Luneberg (78-79) argue that transparency laws have a number of political benefits, including: preventing corruption, entrenching public confidence, improving accountability of public officials, identifying relevant lobbyists, and leveling the playing field for those who do not have preferential access to lawmakers. They discovered that, although lobbying regulations are not implemented systematically across countries, enforcing mandatory registration requirements on lobbyists and their clients generally deters non-state actors from engaging in illicit activity.

The descriptive results found that lobbying within informal structures is utilized by some US companies. This is problematic because we do not yet know the political impact that lobbying has on policy within these countries, but corporate firms (at least sometimes) lobby government officials in informal structures, which goes unstudied. The issue with informal arenas is that its lobbying activity cannot be identified without proper transparency laws in place. These requirements, such as lobbyist registries, allow scholars to understand behavior by studying it. Unfortunately, we do not have the means to identify how lobbying impacts policy in countries with informal structures, which a policy issue because, as this thesis has shown, companies lobby officials in informal structures, even those ruled by autocratic regimes. To this end, studying how businesses lobby and inevitably influence policy in countries with informal structures is important because it allows scholars to better understand the role that nonstate actors play in the international system generally.

APPENDIX 1

CODEBOOK

VARIABLE	DESCRIPTION (VARIABLE_NAME)
LDA reports	Lobbying Disclosure Act reports filed by a company that mention Saudi Arabia, Egypt, or Jordan, Iran, Iraq, Israel, Oman, Turkey, Cyprus, Syria, Palestine, Bahrain, Lebanon, Yemen, United Arab Emirates (UAE), Qatar, or Kuwait in the specific issue section of the report (= 1) Quarterly report mentions of Saudi, Egypt, Jordan (lobbying_sje) Iran, Iraq, Israel, Oman, Turkey, Cyprus, Syria, Palestine, Bahrain, Lebanon, Yemen, United Arab Emirates (UAE), Qatar, or Kuwait (lobbying_all)
Newspaper articles	A quarter sample of articles published by The New York Times, Financial Times, The Wall Street Journal, Foreign Affairs, and The Economist between 2008 and 2016 were searched using Factiva's publication software
Company	All business clients that lobbied the American government between 2008 and 2016 identified on LDA reports and confirmed through Factiva business profiles
Key-word string	A key-word search used to identify newspaper articles that discuss lobbying activity of foreign multinational firms in the informal structures of Saudi Arabia, Egypt, and Jordan The key-word string is unique for each business-country pair. The key-word string is entered into an online search engine (Factiva) and selects articles that mention both company and country names (and eight other selection words) for content analysis The key-word string used to identify articles mentioning: ("Company Name" And ("Saudi Arabia" or "Egypt" or "Jordan")) And (meeting or King or Prince or business or negotiations or negotiating or growth or FDI or lobbying) If a company had 500 or more newspaper stories associated with the key-word string above, then a filter, accounting for articles tagged with the business's name, was added to the string: ("Company Name" And ("Saudi Arabia" or "Egypt" or "Jordan")) And (meeting or King or Prince or business or negotiations or negotiating or growth or FDI or lobbying) And "Company Name"

Number of stories	Total number of newspaper stories for each business-country pair
Case study	Newspaper articles that discussed informal lobbying in Saudi mentions Arabia, Egypt, or Jordan (= 1) (about_sje)
Relevancy	Newspaper articles that mention non-bribery lobbying behavior that take place in countries that do not regulate lobbying (only 20 countries regulate lobbying) (= 1) (relevant)
Subjective intensity	(subjective_intensity) Determined through a content analysis of relevant newspaper articles: 1 = Business negotiations between firm and state or nonstate actors 2 = Business contract is discussed 3 = Business meeting with local corporate affiliate 4 = Business meeting with government representative 5 = Business meeting with King|Prince or Head of government
Hierarchy protocols	Article mentions business negotiations held between a foreign company and local government representative, local affiliate, or other foreign company that occurred in a country that does not regulate lobbying (=1) (negotiations) Article mentions a pending or finalized business contracts awarded to a foreign company by either government, local affiliate, or another foreign company operating within a country that does not regulate lobbying (= 2) (contract) Article mentions business meeting between a foreign company official and local affiliate (= 3) (local_partner) Article mentions business meeting between a foreign company official and local government representative (= 4) (meeting_governmentofficial) Article mentions business meeting between a foreign company official and King, Prince, or equivalent head of government (= 5) (meeting_kph)

APPENDIX 2

ZERO-INFLATED NEGATIVE BINOMIAL REGRESSION MODEL

$$Zero - inflated\ negative\ binominal\ regression\ Model$$

$$\mu i = \exp(\ln(ti) + \beta_1 x_{1\,i} + \beta_2 x_{2\,i} + \cdots + \beta_k x_{k\,i}$$

APPENDIX 3

COMPANY CLIENT LIST

Company
Merrill Lynch
Shell Oil
Noble Energy
General Motors
American Airlines
Boeing Co
ConocoPhillips
Lockheed Martin
Hewlett-Packard
Procter & Gamble
Chevron Corp
Caterpillar Inc
Delta Air Lines
Anadarko Petroleum
United Technologies
US Airways
Occidental Petroleum
Cisco Systems
Apache Corp
Marathon Oil
Coca-Cola Co
Bristol-Myers Squibb
Halliburton Co
Pfizer Inc
Chrysler Group
TIAA-CREF
Eli Lilly & Co
Gap Inc
Honeywell International
Orbital Sciences Corp
Deloitte LLP
Seaboard Corp
Erickson Inc
Monsanto Co
Exelis Inc
Smithfield Foods
Cargill Inc
Exelon Corp
Louis Dreyfus Corp
Festo Corp
Middle East Petroleum
CNH Industrial
CITGO Petroleum
AstraZeneca Pharma
Paramount Farms
Genworth Financial
Royal Wine Corp
Chubb Corp
Energy Systems Group
Hanesbrands Inc
Lyondell Chemical
URS Corp
BP America
Viacom Inc
Mirant Corp
Blue Diamond Growers
Motley Rice LLC
Siemens Corp
Dial Corp
Sigarms Inc
Pacific Coast Feather
Solvay Chemicals
Clear Channel Comm
Aegis Insurance Services
Rhodia Inc
Underwriters Laboratories
SAIC Inc
Deere & Co
Aerojet-General Corp
Kaman Corp
Aeroflex Inc
Hormel Foods
Textron Inc
ILC Dover
Tyco Electronics
Intelsat General Corp
ABF Freight Systems
Interlease Inc
Jeeran Holding Co
Hawker Beechcraft Corp
AbbVie Inc
Herbalife International

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