ARE SELF-REGULATED FIRMS TRUSTWORTHY? A GAME-THEORETIC APPROACH TO COMPLIANCE TRAPS

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Abstract

Governments are increasingly prosecuting companies that fail to demonstrate prior adoption of a crime prevention model or compliance program following the discovery of a crime by one of their managers or employees. In addition, penalties are being increased when human rights violations or white-collar crimes are involved. As a number of publications have shown, the promotion of corporate criminal liability relief for companies that implement compliance programs implies, or should imply, a significant degree of trust on the part of states or regulators towards these companies. Is that trust really possible? To answer this question, we will consider some of the criticisms that these programs have received, paying special attention to both cosmetic compliance programs and the so-called "compliance trap". A game-theoretic model will let us analyze whether the regulator should rely on companies to allow them to develop compliance programs that avoid both the compliance trap and what we call the fake compliance trap.

Keywords

Regulated Self-Regulation, Compliance Program, Criminal Liability of Legal Entities, Trust, Game Theory, Compliance Officer

Summary

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1. INTRODUCTION

In recent decades, a wide range of States have implemented criminal responsibility of legal persons or corporate criminal responsibility[4]. Their goal is to prevent criminal acts committed by business and react effectively against them. This type of legislation was first introduced in Anglo-Saxon countries (especially in the United Kingdom and the United States) and soon extended to other states, such as Japan, Denmark, Holland and France among many others. In one of the most pioneering cases in the United States (*New York Central & Hudson River Railroad vs. United States,* 1909), the company itself was convicted. In Japan, *Law No. 142 for the suppression of crimes related to environmental pollution with adverse effects on people's health* (1970) established the collateral criminal liability of companies. The same took place in other countries[5]. More recently, Spanish-speaking countries such as Argentina, Mexico, Perú, Spain, Chile and Costa Rica have also introduced legal persons' criminal responsibility[6].
Factors such as the complexity of corporate structures, their high degree of specialization and the complexity of information flow make traditional prevention formulas very difficult to apply. For this reason, in addition to sanctioning individuals, States and their regulators have long developed measures to promote regulated self-regulation and to sanction organizations if infractions are committed within them (that are carried out generating some kind of benefit to the organization). One of the clearest manifestations of this has been the expansion of criminal liability of legal persons[7]. This phenomenon is strongly encouraged by internal legal systems and international conventions. In addition, states are increasingly establishing

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[4] Wellner 2005, 427-528.
[5] Johnson 2002; Harding & Joshua 2010.
[6] Aguilera Gordillo 2022, 160-184.
[7] Ayres & Braithwaite 1992; Baer 2009.

harsher criminal penalties against companies, especially when their managers or employees commit human rights or economic crimes[8].
From a socio-legal viewpoint, the criminal liability of legal persons has been much debated[9]. On the one hand, there are a number of states that base this responsibility on a *vicarious liability model*[10][11]. According to this approach, only natural persons have the capacity to make decisions and act. Legal entities or corporations can be criminally convicted in certain circumstances (for example, if there is no effective compliance model in the organization)[12]. On the other hand, we find a *self-responsibility model* according to which the legal person is declared criminally responsible due to an organizational fault and because the organization itself lacks a compliance culture[13]. Thus, if it is shown that the company that committed a crime had previously adopted a compliance program, the punishment may be greatly mitigated.
In any case, the states that have assumed corporate criminal responsibility in their respective criminal codes encourage the implementation of regulated self-regulation within organizations, and have also taken into consideration the need for a compliance officer[14]. In doing so, these states promote the presence of a person (or a group of persons, if it is a collegiate body) to ensures compliance. This person's goal is to encourage other

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[8] Friedman 2020; In this context, companies are increasingly required to conduct *human rights due diligence* on other companies with which they contract (suppliers, distributors, etc.), *vid.* Bonnitcha & McCorquodale 2017, 899-919.
[9] Gómez Tomillo 2023, 1-31.
[10] Laufer 1999.
[11] The dichotomy between the self-responsibility model and the vicarious model is analysed in the document *Liability of Legal Persons for Corruption Offences, co-authored by the European Union and the Council of Europe*, 12-13, URL https://rm.coe.int/liability-of-legal-persons/16809ef7a0 (accessed 27 july 2020).
[12] Aguilera Gordillo 2024.
[13] Ayres & Braithwaite 1992; Schulz & Held 2004; Estlund 2006, 617-634; Kaye 2006, 105-119.
[14] Chandler 2014, 1722-1743.

members of the organization to comply. He or she will also instigate internal investigations and prosecution for non-compliance[15].

Thus, the compliance issue leads to problems in terms of institutional design. Given the limited capacity of the regulator to effectively control business activity, it allows companies to implement compliance programs through self-regulation rules. However, allowing companies to establish compliance programs implies, or should imply, remarkable confidence on the regulator's part towards those companies. Is that trust possible? To answer this question, we will first present the details of what is known as compliance programs and their rationale in the so-called "regulated self-regulation"[16]. Secondly, we will consider some of the criticisms that these programs have received, paying special attention to both cosmetic compliance programs and the so-called "compliance trap" [17]. A game-theoretic model will let us analyze whether the regulator should rely on companies to allow them to develop compliance programs that avoid both the compliance trap and what we call the fake compliance trap.

2. REGULATED SELF-REGULATION, ACCOUNTABILITY, AND COMPLIANCE PROGRAMS

As noted above, regulators tend to transfer regulation and surveillance to the companies themselves to alleviate the cost of controlling the companies. This entails a clear trend towards the privatization of the regulatory norms of numerous business activities and, in the legal-criminal field, in favor of compliance standards and compliance programs[18]. Through regulated self-

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[15] McNeece 2012, 677-692.
[16] Schulz & Held 2004; Estlund 2006, 617-634; Kaye 2006, 105-119.
[17] Krawiec 2003, 487-544; Parker 2006, 591-622.
[18] Huff 1996, 1252-1298; Walsh & Pyrich 1994, 605-666.

regulation, public power validates private regulation due to a greater degree of knowledge, by the business agents themselves, of the deficiencies, requirements, or budgets in the productive processes[19]. In this way, the regulator's intervention regime is transformed from a detailed regulation and ex ante control of the companies' activities to a new status in which the regulator sets guidelines and supervises a company's compliance more loosely, because the companies must articulate monitoring or accountability mechanisms[20].

Thus, the compliance program can be considered, from a socio-legal point of view, as a materialized set of rules, procedures and constraints determined, configured and applied by specific individuals within a company (essentially, by its managers and administrators) to prevent violations of the law by the company's members[21]. So, when a company's member commits a crime and it is demonstrated that the legal person did not establish restrictions and procedures aimed at preventing those crimes, there will be an organizational deficit, resulting in the transfer of criminal responsibility to the legal person. The legal person is then responsible for the constraints put in motion through a compliance program[22].

In other words, compliance "is a system of policies that organizations adopt to determine violations of law and to assure external authorities that they are taking steps to determine violations of law"[23]. In this way, there is ample justification for the development of ethical conduct codes, reporting channels and other internal control standards of necessary compliance, for instance, the obligation to report non-compliance, monitor the execution of compliance programs ("enforced accountability") and develop training

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19 Aguilera 2022, 192-199.
20 Dobbin & Kelly 2007, 1203-1243.
21 Pieth 2011.
22 Aguilera Gordillo 2024.
23 Baer 2009, 949-1019.

programs for employees to internalize ethical codes[24]. The value of this internal discipline is to provide the authorities with greater control than simple external surveillance through "wrong-doing deterrence" and "norm-generation":

"Under enforced self-regulation, *companies with strong records of disciplining their employees would be rewarded*...Internal discipline is in many ways more potent than government prosecution because internal enforcers do not have to surmount the hurdle of proof beyond a reasonable doubt, and do not have to cut through a conspiracy of diffused accountability within the organization.... Enforced self-regulation provides incentives for nominated accountability because corporations that cannot demonstrate that they are conducting their own executions would be singled out for inquisition"[25].

Thus, the final justification of compliance programs is that they are constraints that deter individuals from committing irregularities[26]. This is because those responsible for supervising and monitoring compliance (compliance officers) have a greater knowledge of the company than the regulator, amongst other reasons. In addition, compliance officers promote individual respect towards norms. Self-regulated companies will ultimately benefit because they may be exempted from criminal responsibility, suffer a less harsh penalty and may even not be investigated by the regulator[27]. Accumulated experience has allowed us to empirically study the benefits and limitations of compliance programs[28]. One of the issues that remains to be tackled is that merely dissuasive vicarious regulation does not necessarily encourage commitment to compliance. On the contrary, when high fines are imposed as a deterrence, they do not produce the desired effect since

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[24] Langevoort 2004, 285–317; Hodges 2016.
[25] Ayres and Braithwaite 1992, 114.
[26] Pieth 2011.
[27] Palmet 2012.
[28] Parker 2006, 596.

the company either pays, thus guaranteeing the right not to comply, or resorts to lobbying to avoid paying fines that they deem excessive. Thus, the so-called *deterrence trap* creates great distrust between businesses and regulators[29]. One way to overcome this deterrence trap would be to allow companies to self-regulate. However, various empirical works have shown that this can lead to a new trap, the "compliance trap", which occurs "where there is a lack of political support for the moral seriousness of the law it must enforce"[30]:

"What amounts to compliance with the law is a matter of interpretation, negotiation, and frequently argumentation, between businesses and regulators, their lawyers, and, where matters are litigated, the courts. Compliance is meaningless, or rather has contested meanings, in the absence of some commonly accepted understanding of the way regulatory requirements should be interpreted and applied. The literature on regulatory compliance and responsive regulation suggests that enforcement action should be an opportunity to bring regulators and those regulated closer *together in their views of compliance* with the law"[31].

In the absence of a common understanding of the law, there may be great mistrust between companies and regulators, which may encourage the regulator to use hard deterrence measures - being trapped again in the "deterrence trap"- or opt for "enforcing the law softly and therefore ineffectively". However, this mutual distrust can also lead companies to use compliance programs for their own benefit, that is, in a purely cosmetic way[32]. The appearance of compliance can free the company from being

[29] Parker et al 2004.
[30] Parker 2006, 591.
[31] Parker, 2006, 609.
[32] Krawiec 2003, 487-544.

subjected to surveillance by the regulator. Here there is no longer a compliance trap but a *fake compliance trap*[33].

As we can see, there is a complex strategic relationship between the company and the regulator in which trust plays an important role. If the self-regulated company complies, it needs the regulator's support, which should go beyond mere deterrence. However, if the regulator supports the company's compliance program, it may fall into the *fake compliance trap*. Just as the deterrence trap is a trap for companies, the *fake compliance* one is a trap for the regulator: it serves the company so that the authority behaves as if it complies with the law, obtaining the benefits of a company that truly complies. In the next section, we are going to analyze this strategic relationship.

3. THE STRATEGIC NATURE OF COMPLIANCE PROGRAMS.

Thus, the most critical literature with self-regulatory measures has indicated that there is a risk that compliance programs may be mere smokescreens[34]. On the other hand, there are also reasonable doubt about the regulator's ability to determine when corporations have effectively implemented a compliance program. This implies that either the regulator has to trust that companies are not going to violate the self-imposed rules, procedures and control mechanisms, or it has a great monitoring capacity, which in itself implies a lack of confidence in the companies' self-regulation (*compliance trap*). But when should the regulator trust in the company's self-regulation?

[33] *Star Tribune*, Scandal at Volkswagen offers a case of how not to comply, October 23, 2015.

[34] Baer 2009, 949-1019.

3. a. The compliance dilemma

The well-known prisoner's dilemma provides us with a simple formalization of the problem that the regulator faces in relation to corporations that, given their interests, can act strategically in adopting a compliance program but only follow it if it benefits them. In this situation, the regulator has two options. On the one hand, it may be interested in promoting self-regulation, since corporate control is extraordinarily complex and costly. However, on the other hand, the regulator could prefer a more traditional criminal-legal interpretation and not promote the development of compliance programs[35]. Faced with these two strategies, companies can respond, in turn, in two ways: complying with self-regulation or not complying. The result of crossing these four strategies (those of the regulator and those of the companies) is shown in the following matrix:

Table 1: Self-regulation game as a Prisoner´s Dilemma

		REGULATOR	
		Promoting Self-regulation	Vicarious regulation
COMPANY	To comply	3.3	0.4
	Not to comply	4.0	**2.2**

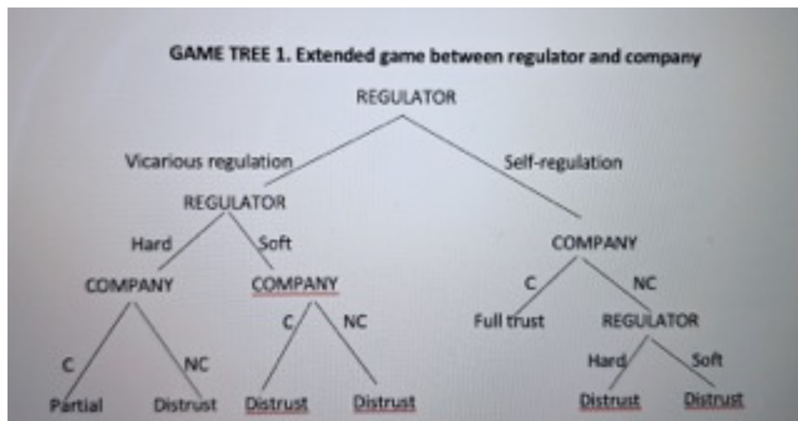
Given the companies´ own interests, what benefits them the least is to develop compliance programs if they believe that the regulator is not going to take them into consideration - it earns nothing (hence the 0 payoff).

[35] Chen & Soltes 2018.

There is no cooperation with the regulator, but regulatory compliance programs need cooperation and trust, as we have seen. Nevertheless, the regulator is not interested in promoting self-regulation if it does not trust companies, since they may be tempted to implement merely strategic fake compliance to benefit from a tolerant regulation, which rewards companies that have apparently adopted a compliance program. The result of this interaction is that the regulator prefers vicarious regulation and the company does not comply with a self-regulation that was only cosmetic. The compliance program fails: the result obtained (2.2) is worse than what they would have achieved if they had trusted each other, that is (3.3).

How can the regulator and companies get out of this vicious circle? The regulator would have to use expensive resources to monitor companies more thoroughly and companies would not reap the legal benefits of self-regulation given the adversarial nature of the relationship[36]. This situation can be overcome by investing in trust, and here legislation is essential when it comes to punishing or supporting the companies.
Thus, the regulator can be hard or soft, as we shall see in the next game[37]:

[36] Baer 2009, 949-1019.
[37] Parker 2006, 591-622; Feldman 2018.



In this tree, the relationship between the regulator and the company is represented as an extended game[38]. At the start, the regulator has two options: to develop develop ex-ante hard or soft legislation or develop it ex-post, that is, once it checks how the companies behave. In the first case (left side of the tree) the regulator initially mistrusts the self-regulation of companies and in the second case (right side of the tree) it initially trusts. However, in both cases mistrust tends to be the overall result. Trust is a very vulnerable belief, which implies that the result of the prisoner's dilemma set out above was quite solid, although it was not definitive, since trust is not impossible.

Indeed, if we analyze this game from the left-hand side, we can see that the regulator regulates ex-ante to bind corporations, even before they develop their compliance programs. This regulation can be soft or hard, that is, the exemption benefits from corporate criminal responsibility may or may not apply, or the penalties for those companies that do not meet or violate essential compliance requirements may be more or less burdensome. This is well known by companies and they therefore act accordingly. Companies

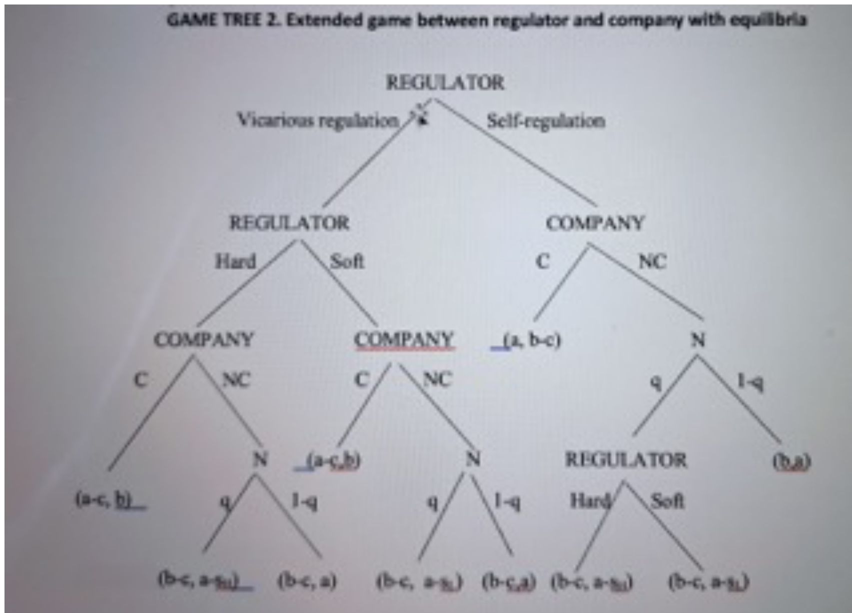
[38] Baird et al. 1994; Jolls et al. 1998, 1471-1550.

can violate compliance requirements (their own self-regulation) (NC, not to comply), or not violate them (C, to comply) under hard or soft regulation. If it is hard, companies have a very strong incentive to comply for fear of sanctions. If the legislation is soft, they have a great incentive to breach their own compliance programs generating distrust from the regulator, which is aware that companies only comply for fear of the law, which can be broken more easily. In such a case, the regulator will prefer hard regulation since trust does not exist. Now, if the legislator opted for soft regulation and companies complied, there would be glimpses that trust may well exist, even partially (partially because the regulator does not have a full assurance that the corporation will honestly self-regulate, given the soft nature of the law, that is, it imposes very soft sanctions). In this case, the regulator can maintain less harsh regulations since the company has developed the compliance program.
If we analyze the tree from the right-hand side, however, we see that the regulator starts the game trusting the corporate entities and, only later, if they do not honor that trust, does it impose regulations with the corresponding penalties. If the company honors that trust, we will witness complete trust between the two parties. The company may consider self-regulating even without the fear of the law, be it soft or hard. However, if companies abuse this trust, the lawmaker must legislate to correct this abuse. Again, it can develop soft regulation (which does not correct anything) or hard regulation (that corrects the self-regulation defects), but at the expense again, of trust.
The strategic relationship between the regulator and company is thus complex. These strategy games show that it is hard to earn trust is difficult and in most cases this balance is not achieved. Now we are going to formally analyze these equilibria.

3.b. Game equilibria

The previous tree-shaped game intuitively reflects the different options facing the regulator and the company. We have seen that, in principle, there are reasons on both sides to distrust because trust in an unstable commodity. However, this intuitive tree does not allow us to calculate the game equilibria, which will help us to better understand what would be the most advantageous option for the regulator, who takes the initiative. A revised version of the game proceeds as follows.

In the first move, the regulator decides whether to regulate in advance (vicarious regulation) or to allow the company to self-regulate. If it decides to regulate itself, then it can make a second move where it can decide to implement a hard or a soft regulation. Whether the regulation is hard or soft depends on the penalties that the law establishes if the Firm breaks the regulation: s_H in the Hard Regulation scenario and s_L in the Soft Regulation scenario. After the regulator has decided whether to implement a hard or a soft regulation, the company, in turn, decides whether to comply (C) or not to comply (NC). If the company decides NC, a move by Nature decides whether the company is sanctioned with probability *q* or avoids sanction with probability *1-q*. This probability captures the state's capacity to oversee the company's activities.



If the regulator decides to allow the company to regulate itself, the company decides whether to comply or not to comply. If it decides not to comply, then Nature decides with probability q if the regulator observes the non-compliance and with probability *1-q* if it does not. Again, probability *q* captures the regulator's capacity of supervision. If the company's misdemeanor is indeed observed by the regulator, it decides whether to implement hard or a soft regulation.

If the regulator decides to regulate in advance and the company complies, then the regulator`s payoffs are *a-c*, with *c* as the cost of designing and implementing the regulation, while the company's payoffs are *b*. If the company does not comply, the payoffs for the Firm depend on the probability of this non-compliance being seen by the state and on whether the regulation is hard or soft. If it is hard and the regulator perceives the

infringement of the regulation, then the company's payoffs are a-s_H, with $a>b$. If the regulation is soft and the regulator sees its infringement, the company's payoff is a-s_L. If the regulator is not aware of the company's misdemeanor, the company's payoffs are a. The regulator's payoffs if the company decides to ignore regulations are b-c with $a>b$.

If the regulator decides to allow the company to self-regulate and the company complies, then the regulator's payoffs are a and the company's payoffs are b-c, with c as the cost incurred in implementing the regulation. If the company breaches the agreement, the regulator's payoffs depend on its capacity to see this breach in the agreement. If it does log it, the regulator's payoffs are b-c, while the company's payoffs depend on whether the regulator implements a hard or a soft regulation. If the regulation is soft, the company's payoffs are a-s_L, whereas if the regulation is hard, the company's payoffs are a-s_H. If the regulator does not see the company's breach of the law, then the regulator payoffs are b and the company's payoff are a.

Let us begin with the company's decision. If the regulator decides to impose a hard regulation in advance, the company will comply if

$$q > \frac{a-b}{\mathrm{sH}} \tag{1}$$

If the regulator decides instead to impose a soft regulation, the company will comply if

$$q > \frac{a-b}{\mathrm{sL}} \tag{2}$$

What happens if the regulator decides to trust the company and allow it to regulate itself? In this case, the company will comply if

$$q > \frac{a+c-b}{\frac{1}{2}sL+\frac{1}{2}sH} \tag{3}$$

Given (1), (2) and (3), what will the regulator do? If (3) holds, which implies a relatively high capacity of state supervision, the regulator can be sure that whether it imposes vicarious or self-regulation the company will comply. Therefore, it decides to allow self-regulation. With

$$\frac{a-b}{sH} < q < \frac{a+c-b}{\frac{1}{2}sL+\frac{1}{2}sH} \tag{4}$$

The regulator's ability to supervise is relatively low, so if it decides to allow the company to regulate itself, the company will breach the self-regulation, and the regulator will instead decide to impose a hard regulation in advance. Therefore, whether to trust the company or not with self-regulation depends on the regulator's capacity to supervise whether the company has breach the agreement. If the state blindly trusts the firm, which implies q=0, then the company will have a powerful incentive to be untrustworthy and to breach the agreement. If the regulator is able to increase its powers of supervision, so that (4) holds, it will impose a hard vicarious regulation. If it continues to increase its powers of supervision so that (3) holds, then it will prefer to allow the company to regulate itself. Notice, however, that in this case the regulator does not completely trust the company; it knows that, in the absence of relatively strong supervision, the company will be untrustworthy.

4. DISCUSSION AND CONCLUSION

As we have seen, three traps could affect the interaction between regulator and corporation. On the one hand, when the regulator opts for a vicarious liability model and imposes severe penalties on those who break regulations, it can fall into the deterrence trap. Companies, pressed by the regulator, can choose to comply with regulations or seek political influence to get rid of them. This could lead to a soft and ineffective application of the regulation to avoid conflicts with large companies. This strained relationship could be well resolved by allowing companies to self-regulate through a compliance program. However, we have pointed out two possible traps related to compliance programs: the *compliance trap*, and the *fake compliance trap*. The first implies a lack of confidence on the part of the regulator in the company's committment to internally control compliance with its own regulations. The second has to do with the strategic use of compliance programs to make the regulator believe that real compliance measures are being implemented. Game theory models confirm these traps, but the

conclusions differ from those that Parker draws regarding the compliance trap.

The prisoner's dilemma reflects the first of the traps: the "deterrence trap". The players distrust each other and the dominant strategy, as we know, is not to cooperate. Thus, faced with a hard regulation that imposes severe fines on companies, business either try to bypass the regulation for their benefit or use political influence to avoid sanctions and convictions. The price of this approach is a lack of cooperation between companies and the regulator, who will treat each other as adversaries.

However, the prisoner's dilemma in matrix form does not reflect one of the fundamental aspects of the strategic relationship between companies and regulators, that is, the latter takes the initiative because it determines the rules of the game. This initiative is determined by the fact that, on the one hand, the regulator decides to establish a relationship with the companies in terms of vicarious liability or self-responsibility, and, on the other hand, the regulator enforces either soft or hard regulation. This is essential in order to understand not only the nature of compliance programs but also the two traps that threaten the proper development of these programs. Just like the prisoner's dilemma, the intuitive game tree (game tree 1) shows that the interaction between regulator and companies can be subject to great mistrust. If the regulator opts for vicarious liability regulation with harsh sanctions (left branch of the game tree) we will have a situation identical to that of the prisoner's dilemma: complete mistrust and a danger of falling into the deterrence trap. On the other hand, if the regulator allows compliance programs to be developed and, at the same time, continues to act suspiciously towards companies, establishing very high fines for those who do not comply, the relationship may become a compliance trap in Parker's sense: The regulator does not take the companies' willingness to comply seriously. However, a very soft legislation can give rise to the strategic use of compliance programs. Soft penalties can encourage companies to implement fake compliance programs to take advantage of the benefits this implementation implies. One example of these benefits

could be less supervision from the regulator just because a program is in place. The following table summarizes these results:

Table 2. Compliance traps

	Enforcing hard regulation	Enforcing soft regulation
Vicarious liability	Deterrance trap	Incentive for not complying
Self-regulation	Compliance trap	Fake compliance trap

In this way, both the prisoner's dilemma and the intuitive tree-shaped game coincide with literature on the prevalence of mutual distrust between company and regulator[39]. This distrust that can lead to the deterrence trap, compliance trap, and fake compliance trap. In turn, a general conclusion can be drawn from the game tree with equilibria: If the regulator is able to supervise, it will be in the best possible position to trust that the company will develop a compliance program properly. It is this supervisory capacity that makes a compliance trap or a fake compliance trap difficult or impossible to fall into (but not the deterrence one).

Thus, given that trust is such a precarious asset in this relationship, one way of investing in it, which emerges from the strategic relationship between the regulator and companies, is to introduce surveillance and monitoring into companies. Thus, although both the extended games and the prisoner's dilemma show that the relationship between both "players" (regulator and company) is - or tends to be - distrustful, it can be improved by incorporating compliance officers who enjoy autonomy, independence and monitoring resources to ensure that the compliance program is executed[40]. How would this affect the relationship between players?

In the prisoner's dilemma, distrust is the dominant strategy, leading to a negative outcome on both sides. The compliance officer allows the

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[39] Gao & Fan 2019.

[40] Treviño et al 2014, 186-205.

company to adopt what game theory literature calls an external solution to the dilemma[41]. This solution is deemed external not because the compliance officer does not belong to the corporate body, but because the dilemma is only resolved with the presence of that third monitoring element. The players alone - regulator and corporate entities - are not able to avoid the dilemma, either because the legal person does not comply or because the regulator is forced (with the added costs and resources that all this implies) to enact hard legislation. In other words, the compliance officer monitors and controls so that legal person complies and the prisoner's dilemma does not occur.

In extended-form games, the presence of a compliance officer would imply increased trust because of the interaction itself. For this reason, this seems to be a necessary requirement in any compliance program. The presence of a compliance officer forces companies to comply with their self-regulation, reducing the regulator's need to strategically harden legislation.

As we can see, the strategic relationship between the regulator and companies to prevent or try to avoid corporate crime is extremely complex. Other games can be developed by taking into account the strategic options of the individuals who are part of a company –where the players would be managers, middle managers, and employees. The conclusion that could be drawn from this type of game would be that trust is complex and can only be achieved by deploying control and surveillance structures and mechanisms[42].

[41] Baird et al 1994.

[42] (Feldman & Kaplan 2020).

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