ChatGPT

Annotated Bibliography: AI Governance Circumvention and Countermeasures

Literature for Pathway 1: Jurisdiction Shopping

William Chao (2023) – *"Crypto exchange's jurisdiction-shopping: a regulatory problem that requires a global response."* Columbia J. of Transnational Law (Bulletin).

Annotation: This law journal article examines how cryptocurrency firms relocate to exploit lenient jurisdictions, offering a close parallel to AI labs seeking "haven states." Chao recounts how exchanges like FTX and Binance moved their headquarters to places like the Bahamas and Malta specifically to avoid stricter U.S. or Chinese regulations [1] [2]. The piece argues that only a coordinated global regulatory approach can prevent such arbitrage. This directly supports the draft's Pathway 1 claim: without uniform international rules, actors will "jurisdiction shop" for permissive zones. The historical examples of crypto exchanges validate the concern that AI companies could likewise flock to nations advertising lax oversight, undermining a moratorium unless extraterritorial enforcement is in place.

National Geographic (2005) – *"The Stem Cell Divide."*

Annotation: This popular science article describes how diverging national policies on embryonic stem cell research created a regulatory diaspora [3]. After the U.S. imposed funding limits in 2001, countries such as the U.K., China, South Korea, and Singapore "set out to become the epicenters" of that research [3]. The result was an influx of talent and investment to those more permissive jurisdictions. This real-world outcome corroborates Pathway 1's analogy: just as scientists relocated when the U.S. restricted stem cell work, AI innovators might migrate to "AI innovation zones" if major countries ban frontier development. The source vividly illustrates the competitive incentive for smaller states to offer safe havens and the difficulty of preventing knowledge and capital flight absent a truly universal ban.

Reflare Research (2023) – *"A History of Government Attempts to Compromise Encryption and Privacy."*

Annotation: This retrospective highlights how determined actors can exploit legal loopholes to circumvent technology controls. In one striking case, PGP encryption's source code was **printed in a book** to get around U.S. export laws – since books are protected under free speech, the strong crypto could be "legally exported" as printed text [4]. This clever end-run around regulation reinforces the draft's point in Pathway 1 that even "perfect" rules invite creative evasion. Just as Phil Zimmermann leveraged First Amendment protections to distribute encryption software (a dual-use technology) despite export controls, an AI lab might similarly find loopholes – for instance, publishing model weights or code in jurisdictions where it's lawful, then importing them – unless governance regimes anticipate and close these gaps.

Literature for Pathway 2: Distributed GPU Swarms

Heng et al. (2018) – *"Deep Gradient Compression: Reducing the communication bandwidth for distributed training."* (ICLR paper)

Annotation: This computer science paper introduces Deep Gradient Compression (DGC), a set of techniques that reduce the data exchanged in distributed neural network training by 270×–600× [5]. It provides a technical backbone for the draft's Pathway 2 scenario, where thousands of consumer-grade GPUs could coordinate over the internet. By drastically cutting communication needs, DGC and similar advances make it feasible to do large-scale training on slower networks. In context, this supports the draft's claim that a "GPU swarm" (e.g. 50,000 GPUs on home connections) can achieve near supercomputer-level performance [6]. The source lends credibility to the BOTEC that a loosely coupled botnet with only 20% utilization could still reach the ~1e25 FLOP target in under a year. In short, the academic evidence shows that network bandwidth – once a limiting factor – is much less of a barrier now, bolstering the plausibility of clandestine distributed training.

【*Note: Deep Gradient Compression results summarized in draft, citing arXiv preprint 1712.01887*】

Folding@home Consortium – *2020 Performance Milestones (Press Release & Stats).*

Annotation: The Folding@home project demonstrated the raw power of distributed computing by exceeding **1.5 exaFLOPS** of throughput in March 2020 [7]. This was *"more raw compute power than the top 100 supercomputers in the world, combined,"* achieved by harnessing millions of volunteer CPUs and GPUs worldwide [7]. This real-world achievement underpins Pathway 2's premise: loosely federated networks can rival state-of-the-art datacenters. The fact that a volunteer medical research grid so quickly assembled an exascale system (with over 4 million CPU cores and 435,000 GPUs [8]) corroborates the draft's contention that criminal or open-source groups might similarly marshal tens of thousands of devices for illicit AI training. Folding@home's success makes it concrete that "GPU swarms" are not just theoretical – they have precedent, and governance must consider the possibility that such networks could be turned toward unauthorized AI development.

Zero Gravity Labs & China Mobile (2025) – *Decentralized Training Breakthrough Press Release.* (Chainwire via The Defiant)

Annotation: This industry press release announces a breakthrough in decentralized AI training: researchers report **training a 107-billion-parameter model over a 1 Gbps network** using a novel low-communication framework called "DiLoCoX" [6]. The decentralized cluster achieved a **357× speedup** over standard all-reduce methods while maintaining model convergence [6]. This source is directly relevant to Pathway 2. It provides concrete (if vendor-reported) evidence that even ultra-large models (comparable to GPT-3/GPT-4 scale) can be trained outside traditional datacenters by coordinating distributed GPUs. The draft speculated that 50k consumer GPUs might train a frontier model in ~9 months; 0G Labs' result suggests that with algorithmic ingenuity, the required GPU count or time could be far lower. In policy terms, this development challenges any moratorium that assumes only a few tech giants can reach frontier capabilities – it shows

that decentralized actors, given the right software, can overcome bandwidth and latency limitations that once made large-scale training the exclusive domain of supercomputers.

Proofpoint Threat Insight (2018) – *"Smominru Monero mining botnet making millions for operators."*

Annotation: This cybersecurity case study of the **Smominru** botnet illustrates the scale and economic motive for illicit distributed computing. Smominru infected over **526,000** computers globally to mine cryptocurrency, at one point yielding about **24 Monero per day (≈$8,500)** for its operators [9] [10]. The network's hash power and worldwide node count went largely undetected for months. This example supports Pathway 2 on two fronts: first, it shows that *malicious actors can quietly amass hundreds of thousands of compromised machines*, indicating that a "GPU swarm" for AI could conceivably hide among consumer devices. Second, it underlines the economic logic driving such efforts – if a botnet can net thousands of dollars a day through cryptomining, one can imagine the far greater payoff for stealthily training a valuable AI model. In essence, Smominru provides a proof-of-concept that globally distributed compute can be marshaled illicitly at scale, and it highlights the challenge for regulators to detect or preempt such efforts.

Literature for Pathway 3: Covert State Programs

Alibek & Handelman (1999); Miller (2001) – *Soviet "Biopreparat" Program Analyses.* (Compiled in Emerging Infectious Diseases and CRS Reports)

Annotation: Multiple historical analyses (including defector Ken Alibek's account in *Biohazard* and a 2001 Congressional Research Service summary) detail the Soviet Union's covert biological weapons program, *Biopreparat*. Operating from **1973–1992**, Biopreparat ran a **"chain of 52 sites"** disguised as civilian biotech facilities and employed **50,000–60,000 personnel** at its peak [11] [12]. Notably, a 1979 anthrax leak in Sverdlovsk killed at least 68 civilians, yet the Soviets maintained the cover story (tainted meat) for a decade [13] [14]. This history directly corroborates the draft's Pathway 3 assertion that a determined state could hide a large-scale illegal AI project behind classification and dual-use cover. The Biopreparat case shows how even enormous operations can evade international detection: it remained secret until a defector revealed it in 1989 [15]. The source underscores the limits of external monitoring when national security is invoked, reinforcing the draft's call for robust inspection regimes. In sum, Biopreparat is precedent that "covert state programs" can and have persisted for years by using legitimate fronts – a cautionary tale for future ASI moratorium enforcement.

Avner Cohen et al. (2020) – *"Duplicity and Self-Deception: Israel, the U.S., and the Dimona Inspections 1964–65."* (Nat'l Security Archive Briefing)

Annotation: This research compilation (with primary documents) examines how Israel concealed its nuclear weapons development at the Dimona reactor in the 1960s. Israeli authorities famously **claimed Dimona was a "textile plant"** when U.S. officials inquired [16]. Later, Israel permitted limited inspections but went to elaborate lengths to mislead U.S. scientists – including building **fake control rooms and false walls** to hide

a plutonium reprocessing facility underground [17]. The U.S. teams left believing Dimona was for peaceful research, and only years later (post-1969) did the truth come out. This deception exemplifies Pathway 3's core dynamic: a state actor shielding a prohibited high-tech project under secrecy and sovereign prerogative. The Dimona story validates the draft's point that even well-intentioned inspections can be foiled by a host nation's preparation and lack of full access. For AI governance, it suggests that a country could similarly mask an ASI training run as something innocuous (e.g. "climate modeling") and defeat superficial audits. The source thus underlines the need for intrusive verification (and the political hurdles thereto), paralleling the draft's argument for an international inspectorate with teeth.

Literature for Pathway 4: Offshore Proxy Datacenters

R. Jeffrey Smith & Joby Warrick (2009) – *"A nuclear power's act of proliferation."* The Washington Post

Annotation: This investigative report reveals how China covertly assisted Pakistan's nuclear weapons program in the 1980s – a real-life example of a great power using a client state to bypass nonproliferation norms. It documents that in 1982, a Chinese military jet delivered to Pakistan **50 kg of weapons-grade uranium (enough for two bombs)** along with a tested nuclear weapon blueprint [18] [19]. This transfer was part of a secret deal approved by top leaders in both countries, and U.S. intelligence knew but chose quiet diplomacy over public action [20] [21]. The episode perfectly mirrors the draft's Pathway 4 scenario: a sponsor state providing banned hardware and designs to an ally under the cover of bilateral agreements and denial. It corroborates the claim that such proxy efforts can "operate for decades" – indeed, Pakistan conducted nuclear tests by 1998, long before the world fully acknowledged China's role. The source bolsters the draft's call for extraterritorial enforcement tools. Just as the China–Pakistan case shows the difficulty of stopping determined state-to-state proliferation with traditional sanctions or inspections, the AI regime must anticipate similar "offshore" collaborations (e.g. a major AI country funding a data center abroad). This historical parallel lends credibility to the need for secondary sanctions and international monitoring of tech transfers.

Atlantic Council (Brian O'Toole, 2019) – *"Secondary Sanctions: Effective policy or risky business?"* (Issue Brief)

Annotation: This policy brief provides insight into the use of **secondary sanctions and extraterritorial measures** to enforce international regimes. It explains that secondary sanctions *"prohibit firms and individuals in other countries from conducting commercial transactions"* with a sanctioned entity, by threatening to cut those third-parties off from the sanctioning country's markets [22]. For example, the brief notes the U.S. sanctioned a Chinese bank and company in 2017 for dealing with North Korea, barring them from any business with U.S. firms [23]. The analysis acknowledges such steps are controversial (viewed as extraterritorial jurisdiction), but also shows they can pressure compliance when multilateral consensus falters. This is directly relevant to Pathway 4 and the draft's proposed countermeasure of *extraterritorial enforcement*. It supports the notion that to prevent "haven" states or proxies from undercutting an ASI moratorium, leading nations might deploy secondary sanctions (e.g. on hardware suppliers or financiers in non-cooperative states). The source thus provides a real policy toolkit for the draft's strategy, while also

cautioning that aggressive use of secondary sanctions can strain diplomatic relations – a nuance important for evaluating the feasibility of the draft's approach.

Literature for Countermeasure: Universal Compute Passports (Attestation)

Yonadav Shavit (2023) – *"What does it take to catch a Chinchilla? Verifying Rules on Large-Scale NN Training via Compute Monitoring."* (ArXiv preprint)

Annotation: This technical paper proposes a concrete design for monitoring and verifying compliance with AI training restrictions, essentially laying out a blueprint for **"compute passports."** Shavit's framework envisions instrumenting specialized AI chips so they 1) *"occasionally save snapshots of the neural network weights"* during training and 2) log cryptographic proofs of the training parameters and progress [24]. Combined with supply-chain tracking of chips, this would allow an international inspectorate to later retrieve the records and confirm whether a given model was trained within agreed rules [25] [26]. Crucially, the paper draws an analogy to nuclear safeguards, noting that in the 1970s the NPT empowered the IAEA to reliably monitor nuclear material – by analogy, robust compute attestation could help verify an ASI development moratorium [27]. This source directly supports the draft's call for cryptographic attestation of high-end chips. It demonstrates technical feasibility: NVIDIA's recent GPUs already have secure enclaves and measured boot capabilities that could be repurposed for this kind of monitoring [28] [29]. Shavit's work lends academic credibility to the idea that we can "embed secure elements" in accelerators to track and report usage. It also tackles privacy concerns by outlining how model details could remain confidential (only hashes and usage stats are reported). In summary, this is foundational research turning the compute passport concept into an engineering problem, thereby strongly buttressing the draft's recommendation for universal attestation as a linchpin of enforcement.

NVIDIA Corporation (2023) – *"Confidential Computing on NVIDIA H100 GPUs for Secure and Trustworthy AI."* (Technical Blog)

Annotation: This industry whitepaper describes the security features of NVIDIA's H100 GPU, the first to support full **hardware-rooted attestation and confidential computing**. It explains that when operating in "CC (Confidential Computing) mode," the H100 generates a signed **"attestation report"** of its boot and firmware state, anchored in an on-die hardware root of trust [28]. The user or a remote verifier can check this report to ensure the GPU is running only authorized code [30]. The blog further details how H100's secure enclave and firmware safeguards (e.g. secure boot, encrypted firmware) establish a chain of trust from power-on through runtime [29] [31]. This source validates the draft's assertion that *"NVIDIA H100 GPUs already include attestation capabilities"*. In broader terms, it demonstrates that the industry is moving toward built-in telemetry for chips – a necessary precursor to "compute passports." For policy makers, the NVIDIA paper provides reassurance that the hardware needed to implement global GPU licensing or monitoring regimes largely exists. It also highlights limitations: these protections are new and must be enabled ("CC-Off" vs "CC-On" modes [32]), meaning political will would be needed to mandate their use. Overall, this technical evidence supports the feasibility of the draft's attestation proposal and shows that aligning incentives (so that CC mode is standard) could make clandestine GPU use much harder.

Literature for Countermeasure: Whole-of-Network Detection & Fusion Monitoring

West Midlands Police (UK) – *Bitcoin Mine Case (Guardian coverage, 2021).*

Annotation: This news report illustrates how combined data sources (electricity usage, heat signatures, and internet traffic) can unmask illicit computing operations. Police in England, suspecting an illegal cannabis farm due to an abnormal power draw and a **"considerable heat source"** detected by drone, raided an industrial unit – and discovered an illegal cryptocurrency mining farm with ~100 computers tapping into the mains [33] [34]. While mining itself wasn't outlawed, the **stolen electricity** and the thermal footprint gave it away. The incident confirms a key premise of the *fusion watchfloor* concept: even when individual signals (like internet traffic) are obfuscated, cross-domain anomalies (power grid spikes, unusual cooling needs, odd-hour access) can flag a covert compute cluster. The article also notes that authorities in China and Iran have begun monitoring energy consumption to crack down on unauthorized crypto mining, after some regional blackouts were blamed on mining operations [35]. By analogy, this supports the draft's suggestion that a dedicated "fusion center" could reliably detect large-scale AI training. It provides a real-world proof that infrastructure monitoring can catch verboten compute usage. However, it also underscores civil liberty concerns – widespread surveillance of power or network data can be sensitive. In sum, the source affirms that whole-of-network detection is technically and even procedurally plausible (since it's already done for crypto), while hinting at the need for governance to balance enforcement with privacy.

Lennart Heim et al. (2024) – *"Computing Power and the Governance of AI."* Centre for Gov. of AI Report Summary

Annotation: This comprehensive report (19 co-authors from academia and industry) argues that monitoring computing power is *"feasible and effective"* as a governance approach, given certain properties of the AI compute supply chain [36] [37]. The authors enumerate why large-scale AI training is **detectable** (it draws tens of megawatts and clusters thousands of high-end chips, creating observable signatures) and **quantifiable** (FLOP/s and energy use can be measured and reported) [38] [37]. They also note the **concentrated supply chain** – a few companies produce most advanced chips and could be required to implement telemetry or registers of sales [39] [40]. This analysis directly supports the draft's multi-layered detection strategy (IXP traffic + grid monitoring + attestation logs). It provides external validation that patterns like all-reduce communication or sustained high power draw are reliable tell-tales of a training run. Additionally, the report addresses potential downsides: it warns that overly aggressive surveillance could *"infringe on civil liberties"* or be co-opted by authoritarian regimes [41] [42]. This balance is important for refining the draft's countermeasure – it suggests that detection should be as targeted and transparent as possible (e.g. focused on large datacenters, with independent auditing of false positives). Overall, the GovAI report strengthens the draft's case that "you *can* catch a covert GPU cluster" by fusing technical signals, while also emphasizing careful implementation to maintain public trust in such monitoring.

Literature for Countermeasure: International Inspectorate (AIEA Model)

International Atomic Energy Agency – *NPT Safeguards Overview* (Shavit 2023, Introduction)

Annotation: As contextualized in Shavit's paper, the IAEA's verification regime for nuclear technology stands as a successful precedent for an AI inspectorate. After the 1970 Nuclear Non-Proliferation Treaty, the IAEA was empowered to conduct intrusive inspections and continuous monitoring of nuclear facilities. Over 50+ years, this system **"helped limit nuclear weapons proliferation to just 9 countries"** while still allowing the spread of peaceful nuclear power to dozens of states [43]. This track record – *a combination of audits, material accounting, and on-site inspections* – directly inspires the draft's proposal for an "International AI Safety Agency" with anywhere-anytime access. The IAEA example provides evidence that sovereign nations can agree to cede a degree of inspection authority in exchange for security guarantees. The cited success (only a few non-compliance cases in decades, all eventually exposed) supports the draft's optimism that an AI inspectorate could deter large clandestine projects by increasing the risk of discovery. However, the source also implicitly underscores the challenges: the IAEA needed significant legal powers and faced obstacles (e.g., Iraq, North Korea). By analogy, an "AIEA" would need strong mandate and enforcement backing (such as U.N. Security Council support) to be effective. In summary, the IAEA's history offers both a proof-of-concept and a playbook for the draft's countermeasure – it shows verification can work if robustly implemented, and it highlights the importance of international buy-in to avoid gaps in coverage.

Arms Control Association (Leonard Spector, 2005) – *"Avoiding Enrichment: Using financial tools to prevent another Khan network."*

Annotation: This analysis examines how the A.Q. Khan nuclear smuggling network evaded detection by exploiting gaps between national jurisdictions, and it advocates for a global audit authority as a solution [44] [45]. It describes how Khan's operation in the 1990s spread centrifuge component manufacturing across Germany, Malaysia, Turkey, Dubai, etc., so that no single country could easily recognize the weapons project [46] [47]. Malaysian investigators noted that *"without knowing the full… total subassembly, no definitive assessment… may be made"* of the end-use [44]. This directly parallels the need for an international AI inspectorate: just as no one state could see Khan's whole puzzle, no single country on its own can spot a distributed ASI project that crosses borders. The article proposes an **"international auditing agency"** with access to trade records and shipping manifests to piece together such clandestine efforts [48] [49]. This idea maps to giving an AI inspectorate authority to monitor chip exports, compute cluster deployments, and research collaboration networks. It also notes political obstacles – some nations resist broad oversight as violating sovereignty [50]. This underscores the draft's point that initial inspections may have to be voluntary or limited, expanding as trust grows. In essence, the Arms Control piece provides a real-world policy argument that mirrors the draft's: only a dedicated international body, looking holistically, can catch sophisticated attempts to circumvent controls. It thus reinforces the importance of setting up an "AI watchdog" akin to IAEA as a long-term safeguard.

Literature for Countermeasure: Performance Bonds and Liability Guarantees

World Nuclear Association – *"Liability for Nuclear Damage."* (updated 2021)

Annotation: This industry summary explains the financial liability regime for nuclear accidents, which serves as a model for the draft's proposed **"kill-switch performance bonds"** for AI. It notes that under the amended Vienna Convention, nuclear plant operators must have a minimum of **300 million Special Drawing Rights (SDR)** in insurance or other financial security [51] – roughly equivalent to US$400 million. This mandated coverage ensures that in the event of a disaster, funds are available for compensation without needing to prove fault (strict liability) [52] [53]. The draft draws directly on this precedent, suggesting that frontier AI developers similarly post a bond (on the order of hundreds of millions of dollars) that would be forfeited if their model causes catastrophic harm or violates agreed safety norms. The nuclear example supports the *feasibility* of such a system: it shows governments have successfully imposed high insurance requirements on risk-bearing industries, creating a financial incentive for safety. It also highlights practical considerations: the WNA piece discusses how liability is limited in time and amount to balance industry viability with public safety [54]. For AI, this suggests any bond scheme must calibrate amounts to be meaningful but not impossible, and define clearly what triggers forfeiture. Overall, the source lends mainstream credibility to the notion of "performance bonds" – it demonstrates that analogous mechanisms exist and have been accepted internationally (over 30 countries adhere to the nuclear conventions). This bolsters the draft's proposal that requiring a hefty upfront security could internalize the risk and discourage reckless AI experiments.

Gabe Weil (2022) – *"Tort Law and Catastrophic AI Risk."* (Lawfare summary of proposal)

Annotation: (For context) Gabe Weil's work, referenced via a Lawfare summary, argues for **strict liability and mandatory insurance** for advanced AI deployments, much like the nuclear liability framework [55] [56]. He proposes that companies working on potentially dangerous AI should face automatic liability for any damages (removing the need to prove negligence) and be required to carry insurance or bonds commensurate with worst-case harms. This directly parallels the draft's countermeasure of performance bonds and insurance pools. The significance of Weil's contribution is in framing AI not just as a tech policy issue but as a **risk management** problem akin to ultra-hazardous activities in other fields. It supports the draft by providing a legal rationale: just as maritime law or nuclear law demands financial guarantees for low-probability, high-impact events, AI law could do the same. The source also addresses how to implement this without stifling innovation – e.g. using a tiered system where only the highest risk AI systems face the steepest bond requirements [57] [56]. By bringing in tort law principles, Weil's analysis helps fortify the draft's suggestion that performance bonds could be not only a deterrent (to discourage skirting the moratorium) but also a means to fund recovery if something goes wrong. In summary, this cross-disciplinary perspective ties together the draft's technical ideas with established legal tools, reinforcing the practicality of requiring "skin in the game" from AI developers as a governance strategy.

【*Note: Weil's proposal is summarized in Adam Jones, ed.,* AI Regulator's Toolbox*, on LessWrong* [55] [56]】

Literature for Countermeasure: Whistleblower Incentives

U.S. Securities & Exchange Commission – *Annual Whistleblower Program Report (FY2024).*

Annotation: The SEC's official report to Congress provides empirical evidence for the power of **whistleblower bounty programs**, which the draft advocates adapting to AI. As of late 2024, the SEC had awarded over **$2.2 billion** to 444 whistleblowers since the program's 2011 inception [58]. These payouts – financed by penalties collected – have led to enforcement actions recovering well in excess of $5 billion in financial fraud cases [59]. The report emphasizes how monetary rewards (10–30% of penalties) plus strong anti-retaliation protections have incentivized insiders to come forward with high-value information. This directly supports the draft's proposal for AI: offering, say, up to $50 million (similar scale to SEC's largest awards) for information on illicit ASI development could expose secret projects that external monitoring fails to catch. The SEC data also addresses a potential skepticism: are large bounties truly needed or effective? The answer seems to be yes – tips surged after major awards became public, and the quality of leads has remained high (many involve well-hidden frauds). Transferring this to AI, the implication is that a generous bounty program could similarly surface deeply buried violations (e.g. a rogue lab hidden in a military program or a corporate skunkworks). Moreover, the SEC's experience shows the importance of a clear process: the whistleblower office, award criteria, and confidentiality measures. The draft can borrow these institutional design elements. In sum, the SEC's success story lends real-world credibility to whistleblower incentives as a cornerstone of enforcement. It demonstrates that paying insiders is a viable strategy to police an otherwise opaque activity – exactly the challenge with covert AI development – and it quantifies the level of rewards likely needed to be compelling.

National Whistleblower Center (2023) – *"Impact of Whistleblower Rewards Programs."*

Annotation: (Supplementary perspective) Analyses by whistleblower advocacy groups have documented that *every major U.S. fraud case against banks in the last decade* was aided by insider tips, largely because of the SEC and CFTC reward programs. They highlight cases like the Volkswagen emissions scandal and major securities frauds where whistleblowers, motivated by potential multi-million dollar awards, provided evidence that regulators on their own would never have found. This supports the draft's intuitive claim that in AI, too, **insiders are uniquely positioned** to notice and report wrongdoing that evades external oversight. Such reports stress that beyond the dollars, the **legal protections** (e.g. anonymity, anti-retaliation provisions) are crucial to making would-be informants feel safe to come forward. For AI governance, this suggests any bounty scheme should be coupled with strong confidentiality and job protection guarantees (as the draft indeed proposes, mirroring SEC's approach). The advocacy literature also counters criticisms, showing that whistleblower incentives *do not* flood agencies with frivolous tips – in practice, agencies manage to filter and focus on serious allegations. This alleviates a concern that an AI whistleblower program might be unworkably noisy. Overall, the whistleblower center's findings reinforce the draft's countermeasure by showing that "paying for truth" works in analogous domains. It turns employees and even co-conspirators into enforcers of last resort – a powerful tool when dealing with highly secretive breaches of a moratorium.

【*Note: Synthesis based on multiple NWC and OECD reports on whistleblowing; see SEC data above for primary statistics supporting efficacy.*】

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