

APPENDIX A: PROOF OF THE INEQUALITY AND THE  
EXPRESSION FOR  $B_{\text{cost}}^2$  IN THM 1

This appendix proves the following inequality from the proof sketch of Thm 1 and derives the corresponding expression for  $B_{\text{cost}}^2$ :

$$\mathbb{E}_{\theta'_T \sim \mathcal{D}_{\theta_T}} \left[ e^{\lambda(C(K) - \hat{C}(K))} \right] \leq e^{\frac{\lambda^2 B_{\text{cost}}^2}{8m}}, \quad (1)$$

where

$$B_{\text{cost}}^2 := \sup_{K \in \mathcal{K}} \sigma_w^4 d_x \cdot \rho_S(K)^2 \cdot \left( 128 \sum_{i=0}^T \rho_M(K)^{4(T-i)} + 64 \sum_{0 \leq i < j \leq T} \rho_M(K)^{4T-2(i+j)} \right), \quad (2)$$

for  $|\lambda| \leq \inf_{K \in \mathcal{K}} \frac{1}{4\sigma_w^2 \cdot \rho_S(K) \cdot \rho_M(K)^{2T}}$ .

*Proof:* For notational simplicity, we write  $\mathbb{E}$  in place of  $\mathbb{E}_{\theta'_T \sim \mathcal{D}_{\theta_T}}$  throughout the proof. The closed-loop system

$$\begin{aligned} x_{t+1} &= Ax_t + Bu_t + w_t, \\ u_t &= -Kx_t, \end{aligned}$$

can be written in the form

$$x_{t+1} = Mx_t + w_t,$$

where  $M := A - BK$ . We assume the system starts from the initial state  $x_0 = 0$ . The control performance is measured by the quadratic cost:

$$C_q(K, \theta_T) = \sum_{t=0}^T x_t^\top S x_t,$$

where  $S := Q + K^\top RK$ . We first expand  $x_t$  in terms of the noise variables:

$$x_t = \sum_{k=0}^{t-1} M^{t-1-k} w_k.$$

Substituting this into the cost expression, we obtain:

$$C_q(K, \theta_T) = \sum_{t=0}^T \sum_{i,j=0}^{t-1} w_i^\top M^{t-1-i^\top} S M^{t-1-j} w_j.$$

Define  $D_{t,ij} := M^{t-1-i^\top} S M^{t-1-j}$ . Then we have

$$C_q(K, \theta_T) = \sum_{t=0}^T \sum_{i,j=0}^{t-1} w_i^\top D_{t,ij} w_j.$$

By grouping terms over time, we define:

$$H_i = \sum_{t=i+1}^T D_{t,ii}, \quad H_{ij} = \sum_{t=\max(i,j)+1}^T D_{t,ij}, \quad i \neq j,$$

and we rewrite the cost as:

$$C_q(K, \theta_T) = \sum_{i=0}^{T-1} w_i^\top H_i w_i + \sum_{0 \leq i < j \leq T-1} \left( w_i^\top H_{ij} w_j + w_j^\top H_{ji} w_i \right).$$

Using the spectral decomposition  $H_i = U \Lambda U^\top$  and defining  $\tilde{w}_i := U^\top w_i$ , we have

$$w_i^\top H_i w_i = \tilde{w}_i^\top \Lambda \tilde{w}_i,$$

where  $\Lambda = \text{diag}(\mu_1, \dots, \mu_{d_x})$  is a diagonal matrix of eigenvalues. Since  $\Lambda$  is diagonal and positive semidefinite, we can upper bound the quadratic form as

$$\tilde{w}_i^\top \Lambda \tilde{w}_i = \sum_{j=1}^{d_x} \mu_j \tilde{w}_{i,j}^2 \leq \|\Lambda\| \cdot \sum_{j=1}^{d_x} \tilde{w}_{i,j}^2 = \|\Lambda\| \cdot \|\tilde{w}_i\|_2^2,$$

due to  $\|\Lambda\| = \max_j \mu_j$ . The inequality follows from the fact that each  $\mu_j \leq \|\Lambda\|$ .

Since the noise vector  $w_i$  has independent sub-Gaussian entries with parameter  $\sigma_w^2$ , and  $U \in \mathbb{R}^{d_x \times d_x}$  is an orthogonal matrix, then for any  $v \in \mathbb{R}^{d_x}$  with  $\|v\|_2 = 1$ , by Def. 1 and Def. 2 in the main body of the paper, which define sub-Gaussian random variables and sub-Gaussian random vectors, we have

$$\mathbb{E} \left[ e^{\lambda v^\top \tilde{w}_i} \right] = \mathbb{E} \left[ e^{\lambda (Uv)^\top w_i} \right] \leq \exp \left( \frac{\lambda^2 \sigma_w^2}{2} \right),$$

where we used that  $Uv$  is a unit vector and that linear combinations of independent sub-Gaussian variables remain sub-Gaussian. Hence,  $\tilde{w}_i$  is a sub-Gaussian vector with parameter  $\sigma_w^2$ .

We note that the definition of a sub-Gaussian vector guarantees sub-Gaussian concentration along any unit direction  $v \in \mathbb{R}^{d_x}$ . In particular, taking  $v = e_j$ , the  $j$ -th standard basis vector, selects the  $j$ -th coordinate of  $\tilde{w}_i$ , i.e.,  $\tilde{w}_{i,j} = e_j^\top \tilde{w}_i$ . Since  $\|e_j\|_2 = 1$ , by the Def. 1, applying the inequality above with  $v = e_j$  gives:

$$\mathbb{E} \left[ e^{\lambda \tilde{w}_{i,j}} \right] = \mathbb{E} \left[ e^{\lambda e_j^\top \tilde{w}_i} \right] \leq \exp \left( \frac{\lambda^2 \sigma_w^2}{2} \right),$$

which shows that each entry  $\tilde{w}_{i,j}$  is a sub-Gaussian random variable with parameter  $\sigma_w^2$ .

Since each  $\tilde{w}_{i,j}$  is a sub-Gaussian variable with parameter  $\sigma_w^2$ , we apply the result from [1, Appendix B], which gives:

$$\mathbb{E} \left[ e^{\lambda (\tilde{w}_{i,j}^2 - \mathbb{E}[\tilde{w}_{i,j}^2])} \right] \leq \exp(16\lambda^2 \sigma_w^4).$$

Let  $\Lambda = \text{diag}(\mu_1, \dots, \mu_{d_x})$ , where  $\mu_i$  is the  $i^{\text{th}}$  eigenvalue of  $H_i$ . Then we have

$$\tilde{w}_i^\top \Lambda \tilde{w}_i = \sum_{j=1}^{d_x} \mu_j \tilde{w}_{i,j}^2,$$

and we can upper bound the centered sum as

$$\sum_{j=1}^{d_x} \mu_j (\tilde{w}_{i,j}^2 - \mathbb{E}[\tilde{w}_{i,j}^2]) \leq \|\Lambda\| \cdot \sum_{j=1}^{d_x} (\tilde{w}_{i,j}^2 - \mathbb{E}[\tilde{w}_{i,j}^2]),$$

due to  $\|\Lambda\| = \max_j |\mu_j|$ . Applying the bound for each  $\tilde{w}_{i,j}$  and combining, we obtain:

$$\begin{aligned} \mathbb{E} \left[ e^{\lambda (\tilde{w}_i^\top \Lambda \tilde{w}_i - \mathbb{E}[\tilde{w}_i^\top \Lambda \tilde{w}_i])} \right] &= \mathbb{E} \left[ e^{\lambda (w_i^\top H_i w_i - \mathbb{E}[w_i^\top H_i w_i])} \right] \\ &\leq \exp(16\lambda^2 \|\Lambda\|^2 \sigma_w^4 d_x), \end{aligned}$$

for all  $\lambda$  such that  $|\lambda| \leq \frac{1}{4\sigma_w^2 \|\Lambda\|}$ , by the result from [1, Appendix B]. That is,

$$\mathbb{E} \left[ e^{\lambda (w_i^\top H_i w_i - \mathbb{E}[w_i^\top H_i w_i])} \right] \leq \exp(16\lambda^2 \|H_i\|^2 \sigma_w^4 d_x),$$

for all  $\lambda$  such that  $|\lambda| \leq \frac{1}{4\sigma_w^2\|H_{ij}\|}$ , by the result from [1, Appendix B].

We now provide a detailed derivation for bounding the moment generating function (MGF) of the cross term  $w_i^\top H_{ij} w_j$ , where  $w_i$  and  $w_j$  are independent random vectors with sub-Gaussian entries and  $i \neq j$ . Our goal is to upper bound the centered MGF:

$$\mathbb{E} \left[ e^{\lambda(w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j])} \right].$$

We show how to express the bilinear form  $w_i^\top H_{ij} w_j$  as a quadratic form, which allows us to apply the result from [1, Appendix B].

Let  $\zeta_{ij} \in \mathbb{R}^{2d_x}$  be the concatenated vector

$$\zeta_{ij} := \begin{bmatrix} w_i \\ w_j \end{bmatrix},$$

and define the symmetric block matrix  $\Psi_{ij} \in \mathbb{R}^{2d_x \times 2d_x}$  as

$$\Psi_{ij} := \begin{bmatrix} 0 & H_{ij} \\ H_{ij}^\top & 0 \end{bmatrix}.$$

We compute the quadratic form  $\zeta_{ij}^\top \Psi_{ij} \zeta_{ij}$ :

$$\begin{aligned} \zeta_{ij}^\top \Psi_{ij} \zeta_{ij} &= \begin{bmatrix} w_i^\top & w_j^\top \end{bmatrix} \begin{bmatrix} 0 & H_{ij} \\ H_{ij}^\top & 0 \end{bmatrix} \begin{bmatrix} w_i \\ w_j \end{bmatrix} \\ &= w_i^\top H_{ij} w_j + w_j^\top H_{ij}^\top w_i \\ &= 2w_i^\top H_{ij} w_j, \end{aligned}$$

where the last step uses that both terms are scalars and equal.

Thus, we have:

$$w_i^\top H_{ij} w_j = \frac{1}{2} \zeta_{ij}^\top \Psi_{ij} \zeta_{ij}.$$

This shows that the centered bilinear form can be written as a centered quadratic form over the augmented vector  $\zeta_{ij}$ .

$$w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j] = \frac{1}{2} (\zeta_{ij}^\top \Psi_{ij} \zeta_{ij} - \mathbb{E}[\zeta_{ij}^\top \Psi_{ij} \zeta_{ij}]).$$

Then we have

$$\mathbb{E} \left[ e^{\lambda(w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j])} \right] = \mathbb{E} \left[ e^{\frac{\lambda}{2} (\zeta_{ij}^\top \Psi_{ij} \zeta_{ij} - \mathbb{E}[\zeta_{ij}^\top \Psi_{ij} \zeta_{ij}])} \right].$$

We now perform a spectral decomposition of the symmetric matrix  $\Psi_{ij}$ : let

$$\Psi_{ij} = \mathcal{U}_{ij} \Sigma_{ij} \mathcal{U}_{ij}^\top,$$

where  $\Sigma_{ij} = \text{diag}(\nu_1, \dots, \nu_{2d_x})$  is a diagonal matrix of eigenvalues and  $\mathcal{U}_{ij} \in \mathbb{R}^{2d_x \times 2d_x}$  is orthogonal. Define the rotated noise vector

$$\tilde{\zeta}_{ij} := \mathcal{U}_{ij}^\top \zeta_{ij} \in \mathbb{R}^{2d_x}.$$

Then we can rewrite the quadratic form as

$$\zeta_{ij}^\top \Psi_{ij} \zeta_{ij} = \tilde{\zeta}_{ij}^\top \Sigma_{ij} \tilde{\zeta}_{ij} = \sum_{k=1}^{2d_x} \nu_k \tilde{\zeta}_{ij,k}^2.$$

Since  $w_i$  and  $w_j$  are independent and each has i.i.d. sub-Gaussian entries with parameter  $\sigma_w^2$ , the concatenated vector  $\zeta_{ij}$  is also sub-Gaussian with parameter  $\sigma_w^2$ . Moreover,

similar to the analysis of  $\tilde{w}_i$ , since  $\mathcal{U}_{ij}$  is orthogonal,  $\tilde{\zeta}_{ij} = \mathcal{U}_{ij}^\top \zeta_{ij}$  is sub-Gaussian vector with parameter  $\sigma_w^2$ .

By the definition of a sub-Gaussian vector Def. 2, for any  $v \in \mathbb{R}^{2d_x}$  with  $\|v\|_2 = 1$ , we have

$$\mathbb{E} \left[ e^{\lambda v^\top \tilde{\zeta}_{ij}} \right] = \mathbb{E} \left[ e^{\lambda (\mathcal{U}_{ij} v)^\top \zeta_{ij}} \right] \leq \exp \left( \frac{\lambda^2 \sigma_w^2}{2} \right).$$

Hence,  $\tilde{\zeta}_{ij}$  is a sub-Gaussian vector with parameter  $\sigma_w^2$ .

In particular, for each  $k$ , taking  $v = e_k$  (the  $k$ -th standard basis vector in  $\mathbb{R}^{2d}$ ), we obtain

$$\mathbb{E} \left[ e^{\lambda \tilde{\zeta}_{ij,k}} \right] = \mathbb{E} \left[ e^{\lambda e_k^\top \tilde{\zeta}_{ij}} \right] \leq \exp \left( \frac{\lambda^2 \sigma_w^2}{2} \right),$$

which shows that each coordinate  $\tilde{\zeta}_{ij,k}$  is a sub-Gaussian random variable with parameter  $\sigma_w^2$ .

Since each  $\tilde{\zeta}_{ij,k}$  is sub-Gaussian with parameter  $\sigma_w^2$ , we apply the scalar MGF bound from [1, Appendix B], which gives:

$$\mathbb{E} \left[ e^{\lambda (\tilde{\zeta}_{ij,k}^2 - \mathbb{E}[\tilde{\zeta}_{ij,k}^2])} \right] \leq \exp(16\lambda^2 \sigma_w^4).$$

Then, the centered quadratic form becomes:

$$\tilde{\zeta}_{ij}^\top \Sigma_{ij} \tilde{\zeta}_{ij} - \mathbb{E}[\tilde{\zeta}_{ij}^\top \Sigma_{ij} \tilde{\zeta}_{ij}] = \sum_{k=1}^{2d_x} \nu_k (\tilde{\zeta}_{ij,k}^2 - \mathbb{E}[\tilde{\zeta}_{ij,k}^2]),$$

which can be bounded as

$$\sum_{k=1}^{2d_x} \nu_k (\tilde{\zeta}_{ij,k}^2 - \mathbb{E}[\tilde{\zeta}_{ij,k}^2]) \leq \|\Sigma_{ij}\| \cdot \sum_{k=1}^{2d_x} (\tilde{\zeta}_{ij,k}^2 - \mathbb{E}[\tilde{\zeta}_{ij,k}^2]),$$

where  $\|\Sigma_{ij}\| := \max_k |\nu_k|$ .

To bound the moment generating function of the centered bilinear form, we recall that

$$\mathbb{E} \left[ e^{\lambda(w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j])} \right] = \mathbb{E} \left[ e^{\frac{\lambda}{2} (\zeta_{ij}^\top \Psi_{ij} \zeta_{ij} - \mathbb{E}[\zeta_{ij}^\top \Psi_{ij} \zeta_{ij}])} \right].$$

By the result from [1, Appendix B], applying the composition of independent sub-Gaussian quadratic bounds and combining the  $2d_x$  terms, we obtain:

$$\mathbb{E} \left[ \exp \left( \lambda \sum_{k=1}^{2d_x} (\tilde{\zeta}_{ij,k}^2 - \mathbb{E}[\tilde{\zeta}_{ij,k}^2]) \right) \right] \leq \exp(16 \cdot 2d_x \lambda^2 \sigma_w^4).$$

By replacing  $\lambda$  as  $\frac{\lambda \|\Sigma_{ij}\|}{2}$  to account for the factor in front of the quadratic form, we conclude:

$$\mathbb{E} \left[ e^{\frac{\lambda}{2} (\zeta_{ij}^\top \Psi_{ij} \zeta_{ij} - \mathbb{E}[\zeta_{ij}^\top \Psi_{ij} \zeta_{ij}])} \right] \leq \exp(8\lambda^2 \|\Sigma_{ij}\|^2 \sigma_w^4 d_x),$$

which implies

$$\mathbb{E} \left[ e^{\lambda(w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j])} \right] \leq \exp(8\lambda^2 \|\Sigma_{ij}\|^2 \sigma_w^4 d_x),$$

for all  $\lambda$  such that  $|\lambda| \leq \frac{1}{4\sigma_w^2 \|\Sigma_{ij}\|}$ . That is,

$$\mathbb{E} \left[ e^{\lambda(w_i^\top H_{ij} w_j - \mathbb{E}[w_i^\top H_{ij} w_j])} \right] \leq \exp(8\lambda^2 \|H_{ij}\|^2 \sigma_w^4 d_x),$$

for all  $\lambda$  such that  $|\lambda| \leq \frac{1}{4\sigma_w^2 \|H_{ij}\|}$ .

We first consider the deviation of the quadratic cost for a single trajectory  $\theta'_T \sim \mathcal{D}_{\theta_T}$ . From the previous derivation

using the structure of the cost in terms of  $\{H_i, H_{ij}\}$  and the sub-Gaussianity of  $w_t$ , we obtain:

$$\begin{aligned} & \mathbb{E} \left[ e^{\lambda (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_T'))} \right] \\ &= \mathbb{E} \left[ \exp \left( \lambda \sum_{i=0}^{T-1} \left( \mathbb{E}[w_i^\top H_i w_i] - w_i^\top H_i w_i \right) \right. \right. \\ & \quad \left. \left. + \sum_{0 \leq i < j \leq T-1} \left( \mathbb{E}[w_i^\top H_{ij} w_j] - w_i^\top H_{ij} w_j \right) \right) \right], \\ &\leq \mathbb{E} \left[ \exp \left( \lambda \sum_{i=0}^T \left( \mathbb{E}[w_i^\top H_i w_i] - w_i^\top H_i w_i \right) \right. \right. \\ & \quad \left. \left. + \sum_{0 \leq i < j \leq T} \left( \mathbb{E}[w_i^\top H_{ij} w_j] - w_i^\top H_{ij} w_j \right) \right) \right], \end{aligned}$$

for all  $|\lambda| \leq \frac{1}{4\sigma_w^2 \max\{\max_i \|H_i\|, \max_{i < j} \|H_{ij}\|\}}$ . We apply the previous bounds for the diagonal and off-diagonal terms. By Jensen's inequality and the fact that the moment generating function of a sum is upper bounded by the product of the individual MGFs (for sub-exponential variables), we obtain:

$$\begin{aligned} & \mathbb{E} \left[ e^{\lambda (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_T'))} \right] \\ &\leq \exp \left( \lambda^2 \sigma_w^4 d_x \left( \sum_{i=0}^T 16 \|H_i\|^2 + \sum_{0 \leq i < j \leq T} 8 \|H_{ij}\|^2 \right) \right), \end{aligned}$$

Let  $\hat{C}(K) := \frac{1}{m} \sum_{i=1}^m C_q(K, \theta_{i,T})$  denote the empirical cost computed from  $m$  i.i.d. trajectories  $\{\theta_{i,T}\}_{i=1}^m$ .

Then the deviation between the expected and empirical cost can be written as

$$\mathbb{E} \left[ e^{\lambda (C(K) - \hat{C}(K))} \right] = \mathbb{E} \left[ e^{\lambda (\mathbb{E}[C_q(K, \theta_T)] - \frac{1}{m} \sum_{i=1}^m C_q(K, \theta_{i,T}))} \right].$$

We now use linearity of expectation to rewrite:

$$\begin{aligned} & \mathbb{E}[C_q(K, \theta_T)] - \frac{1}{m} \sum_{i=1}^m C_q(K, \theta_{i,T}) \\ &= \frac{1}{m} \sum_{i=1}^m (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T})). \end{aligned}$$

Therefore,

$$\begin{aligned} & \mathbb{E} \left[ e^{\lambda (C(K) - \hat{C}(K))} \right] \\ &= \mathbb{E} \left[ e^{\lambda \cdot \frac{1}{m} \sum_{i=1}^m (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right] \\ &= \mathbb{E} \left[ \prod_{i=1}^m e^{\frac{\lambda}{m} (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right]. \end{aligned}$$

Since the  $C_q(K, \theta_{i,T})$  are independent (due to the independent system parameters and noise sequence), the random variable  $\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T})$  is also independent. Hence, the product of exponentials factorizes:

$$\begin{aligned} & \mathbb{E} \left[ \prod_{i=1}^m e^{\frac{\lambda}{m} (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right] \\ &= \prod_{i=1}^m \mathbb{E} \left[ e^{\frac{\lambda}{m} (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right]. \end{aligned}$$

Thus, we conclude:

$$\mathbb{E} \left[ e^{\lambda (C(K) - \hat{C}(K))} \right] = \prod_{i=1}^m \mathbb{E} \left[ e^{\frac{\lambda}{m} (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right].$$

From the previous derivation for a single trajectory, we know that for all  $\lambda' \in \left[ 0, \frac{1}{4\sigma_w^2 \max\{\max_i \|H_i\|, \max_{i < j} \|H_{ij}\|\}} \right]$ , we have:

$$\begin{aligned} & \mathbb{E} \left[ e^{\lambda' (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right] \\ &\leq \exp \left( \lambda'^2 \sigma_w^4 d_x \cdot \left( \sum_{i=0}^T 16 \|H_i\|^2 + \sum_{0 \leq i < j \leq T} 8 \|H_{ij}\|^2 \right) \right). \end{aligned}$$

We apply this bound with  $\lambda' = \lambda/m$ , and use that all  $m$  terms are identical. This gives:

$$\begin{aligned} & \mathbb{E} \left[ e^{\lambda (C(K) - \hat{C}(K))} \right] = \prod_{i=1}^m \mathbb{E} \left[ e^{\frac{\lambda}{m} (\mathbb{E}[C_q(K, \theta_T)] - C_q(K, \theta_{i,T}))} \right] \\ &\leq \left( \exp \left( \frac{\lambda^2}{m^2} \cdot \sigma_w^4 d_x \cdot \left( \sum_{i=0}^T 16 \|H_i\|^2 + \sum_{0 \leq i < j \leq T} 8 \|H_{ij}\|^2 \right) \right) \right)^m \\ &= \exp \left( \frac{\lambda^2}{m} \cdot \sigma_w^4 d_x \cdot \left( \sum_{i=0}^T 16 \|H_i\|^2 + \sum_{0 \leq i < j \leq T} 8 \|H_{ij}\|^2 \right) \right). \end{aligned}$$

This implies the quadratic cost is sub-exponential with variance proxy:

$$B^2 := \sigma_w^4 d_x \left( 128 \sum_{i=0}^T \|H_i\|^2 + 64 \sum_{0 \leq i < j \leq T} \|H_{ij}\|^2 \right).$$

We now derive an explicit upper bound on  $B^2$  in terms of system-dependent quantities  $\rho_S(K)$  and  $\rho_M(K)$ . Recall the definitions:

$$\rho_S(K) := \|Q\|_F + \|K\|^2 \|R\|_F, \quad \rho_M(K) := \rho_A + \rho_B \|K\|,$$

where  $\rho_A := \max\{|a_1|, |a_2|\}$  and  $\rho_B := \max\{|b_1|, |b_2|\}$ . These provide bounds on  $\|S\|$  and  $\|M\|$ :

$$\|S\| \leq \rho_S(K), \quad \|M\| \leq \rho_M(K).$$

Each  $H_i$  corresponds to the contribution of  $w_i$  to the quadratic cost:

$$H_i = M^{T-i\top} \dots M^\top S M \dots M^{T-i}.$$

Hence, we can bound:

$$\|H_i\| \leq \|S\| \cdot \|M\|^{2(T-i)} \leq \rho_S(K) \cdot \rho_M(K)^{2(T-i)}.$$

The cross-term matrix  $H_{ij}$  arises from the interaction between  $w_i$  and  $w_j$ :

$$H_{ij} = M^{T-i\top} \dots M^\top S M \dots M^{T-j},$$

so that

$$\begin{aligned} \|H_{ij}\| &\leq \|S\| \cdot \|M\|^{T-i+T-j} = \|S\| \cdot \|M\|^{2T-i-j} \\ &\leq \rho_S(K) \cdot \rho_M(K)^{2T-i-j}. \end{aligned}$$

Substituting into the expression:

$$B^2 \leq \sigma_w^4 d_x \cdot \rho_S(K)^2 \cdot \left( 128 \sum_{i=0}^T \rho_M(K)^{4(T-i)} + 64 \sum_{0 \leq i < j \leq T} \rho_M(K)^{4T-2(i+j)} \right).$$

Then we define

$$B_{\text{cost}}^2 := \sup_{K \in \mathcal{K}} \sigma_w^4 d_x \cdot \rho_S(K)^2 \cdot \left( 128 \sum_{i=0}^T \rho_M(K)^{4(T-i)} + 64 \sum_{0 \leq i < j \leq T} \rho_M(K)^{4T-2(i+j)} \right).$$

This gives a compact upper bound on  $B_{\text{cost}}^2$  in terms of  $\rho_S(K)$ ,  $\rho_M(K)$ ,  $\sigma_w^2$ ,  $d_x$ , and  $T$ .

For the admissible range of  $\lambda$ , we need the maximum spectral norm across all  $H_i$  and  $H_{ij}$ . Since

$$\max_i \|H_i\| = \|H_0\| \leq \rho_S(K) \cdot \rho_M(K)^{2T},$$

and

$$\max_{i < j} \|H_{ij}\| = \|H_{01}\| \leq \rho_S(K) \cdot \rho_M(K)^{2T-1},$$

we get

$$|\lambda| \leq \inf_{K \in \mathcal{K}} \frac{1}{4\sigma_w^2 \cdot \rho_S(K) \cdot \rho_M(K)^{2T}}.$$

Hence, we have obtained Eq. (1) and the expression for  $B_{\text{cost}}$  Eq. (2) used in Thm 1, which completes the proof.  $\square$

## REFERENCES

- [1] J. Honorio and T. Jaakkola, "Tight bounds for the expected risk of linear classifiers and PAC-Bayes finite-sample guarantees," in *Proc. of the International Conference on Artificial Intelligence and Statistics (AISTATS)*, pp. 384–392, 2014.