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LOBBYING AND ANTI-CORRUPTION POLICY IN THE U.S. AND ITS IMPLICATIONS IN THE REPUBLIC OF ARMENIA

Abstract

This article examines the institution of lobbying in the United States, presenting its historical development, regulatory framework, and empirical scope, with the aim of drawing lessons for the Republic of Armenia. In the U.S. context, lobbying has evolved into a significant economic and political sector, creating both democratic opportunities and risks of corruption. By contrast, Armenia lacks a comprehensive legal framework for lobbying, despite pressing anti-corruption imperatives. The article argues that Armenia could benefit from adapting elements of the American model – particularly transparency, registration, public access, and oversight – while tailoring these mechanisms to its local institutional context and democratic needs. The study concludes by offering recommendations to Armenia’s emerging reform agenda

Keywords: *Lobbying, USA, anti-corruption policy, lobbying groups, Armenian diaspora lobbying organizations in the U.S., Republic of Armenia, lobbying oversight.*

Introduction

Lobbying is a distinctive institution within the political system, functioning as a mechanism through which private and public organizations, political parties,

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trade unions, and interest groups seek to influence the decision-making processes of government and parliament in a given state.

The term “*lobbying*” is derived from the English word *lobby*, meaning “backrooms” or corridors of power. Many scholars trace its popular usage to the second half of the nineteenth century in the United States, during the presidency of Ulysses S. Grant (1869–1877). According to a well-known anecdote, the term originated from the lobby of the Willard Hotel in Washington, D.C., where the President, ministers, and senators reportedly met with individuals who pressed their requests and interests. Although this account is more legend than precise etymology, it illustrates how informal access to corridors of power came to characterize the phenomenon of lobbying.

In the United States, lobbying is protected by the First Amendment (freedom of petition and speech) adopted as part of the Constitution in 1789, thereby recognizing the right of citizens and organized interests to influence government. Over time, the United States introduced formal regulation. For example, a law adopted in 1876 required individuals engaged in lobbying to disclose their activities and register with the House of Representatives.

In 1946, a special law was enacted to regulate lobbying activities, establishing the requirement for the registration of all professional lobbyists. The primary purpose of this law was to create a comprehensive system for identifying and registering lobbyists and to provide the state with information about the pressure exerted by lobbying groups on the country’s legislative bodies. This act applied only to lobbyists active in the U.S. Congress.

In the United States, lobbying has played a significant role in preparing policy briefs, raising awareness among legislators, and facilitating flows of information. Today, it is an integral part of the country’s pluralistic democratic system.

The Current Scale and Influence of Lobbying in the United States

In the United States today, there are over 12,000 registered lobbyists and roughly 2,000 corporations and organizations actively represented (federal level).¹ Lobbying activity in the U.S. constitutes not only a political influence mechanism but a major economic sector with its own market, specialized

¹ *OpenSecrets*. “Lobbying Database: Number of Registered Lobbyists 2024.” **Center for Responsive Politics** 2024, <https://www.opensecrets.org/federal-lobbying> accessed on 17.11.2025

personnel and services. In 2024, lobbying expenditures in the U.S. exceeded \$4.2 billion.² The leading sectors in terms of spending are pharmaceuticals & healthcare (~\$700 million), technology & digital (~\$450 million), finance & banking (~\$350 million), and energy & industrial companies (~\$300 million).³ These figures underline that lobbying is deeply intertwined with the economic foundations of American political influence.

The top spending entities include major corporations with permanent Washington presence: for example, Pfizer Inc. in pharmaceuticals; Meta Platforms and Amazon.com Inc. in technology and digital markets; ExxonMobil in energy; and the U.S. Chamber of Commerce in business advocacy.⁴ These actors not only fund external lobbying firms but often maintain their own in-house lobbying departments.

Lobbying groups in the United States include individuals as well as political, economic, and social organizations, movements, and state-level institutions. They differ in their goals, methods, and techniques of influence. These actors are commonly referred to as *pressure groups* or *interest groups*. One classification distinguishes the following types:

1. **Political lobbying groups:** Financial, economic, and social groups that seek influence through electoral campaigns and legislative processes.
2. **Socially oriented lobbying groups:** For example, trade unions, veterans', women's, youth, and environmental organizations, whose lobbying strength often correlates with the economic significance of their sector.
3. **Economic lobbying organizations:** Groups whose primary lever of influence in decision-making stems from their economic interests.
4. **Regional lobbying groups:** Entities seeking specific territorial or state-level privileges.
5. **Foreign lobbying groups (ethnic interest groups):** Organizations formed on the basis of ethnic, cultural, or religious identity that seek to influence the host state's foreign policy.

² Statista. "Total Lobbying Expenditures in the United States from 1998 to 2024." Statista Research Department, 2025.

³ OpenSecrets. *Lobbying Database: Top Industries 2024*. Center for Responsive Politics, 2024.

⁴ OpenSecrets. *Top Lobbying Clients, 2024*. Center for Responsive Politics, 2024.

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6. **Special lobbying groups:** Contracted lobbying organizations used when a company cannot or chooses not to lobby directly.⁵

7. **Ethnic lobbying groups:** A subtype of foreign or interest groups formed around ethnic, cultural, or religious ties, aiming to support their “home” state by influencing policy in the host country.

Ethnic lobbying groups in the United States engage in a variety of activities, including providing legislators with information, participating in the drafting of bills, organizing public campaigns to shape opinion and policy, and maintaining a long-term strategic presence in Washington.

Armenian Lobbying Groups in the United States

The Armenian community, one of the oldest and most influential components of American society with an Armenian heritage, established an organized lobbying network as early as the mid-20th century with the aim of protecting Armenian interests within the U.S. political system.

Key areas of Armenian lobbying activity include the recognition of the Armenian Genocide, support for the security of Armenia and Artsakh, and the involvement of the American-Armenian community in U.S. foreign policy decision-making. Among the most prominent American-Armenian ethnic lobbying organizations are **the Armenian National Committee of America (ANCA)** and **the Armenian Assembly of America (AAA)**.⁶ ANCA functions as a “people’s embassy,” engaging in congressional outreach, preparing briefings, and conducting legislative advocacy—for example, in support of U.S. assistance to Armenia and Artsakh.

One of the most significant achievements of Armenian lobbying efforts is the recognition of the Armenian Genocide by the U.S. Congress. For decades, Armenian-American organizations worked tirelessly to secure this historic decision. Finally, in October 2019, the House of Representatives adopted H. Res. 296, officially recognizing the 1915–1923 Armenian Genocide in the Ottoman Empire, and in December of the same year, the Senate unanimously passed S.Res. 150.

⁵ Thomas P. Lyon, John W. Maxwell, “Astroturf: Interest Group Lobbying and Corporate Strategy”. *Journal of Economics & Management Strategy*, Volume 13, Number 4, 2004.

⁶ Armenian National Committee of America (ANCA), *Advocacy & Policy Initiatives*, <https://anca.org>. accessed on 17.11.2025.

This accomplishment marked the culmination of a long-standing struggle, made possible through the persistent efforts of Armenian-American lobbyists.⁷

The second major lobbying organization is **the Armenian General Benevolent Union (AGBU)**. It implements political and educational programs, organizes student internships in the U.S. Congress, holds conferences, and facilitates connections with government agencies. The AGBU also conducts public-policy initiatives and played an active role in supporting Section 907 of the Foreign Assistance Act – a provision adopted in 1992 that restricted U.S. aid to Azerbaijan.⁸ Armenian General Benevolent Union, although mainly cultural and educational in nature, thanks to its wide network, often supports the implementation of pro-Armenian public relations and information campaigns.⁹

In addition, the U.S. structures of the diaspora-based **Armenian Revolutionary Federation (ARF)** also contribute to both party-level and public advocacy efforts.

In sum, the Armenian-American lobbying ecosystem functions as a mature, highly organized, long-term strategic movement that combines political lobbying, public diplomacy, and cultural influence to keep Armenian issues on the U.S. agenda. These structures not only ensure the sustained visibility of Armenian concerns in American policymaking but also serve as a model for other small nations seeking to shape their own influence in foreign affairs.

This lobbying activity has become a key factor in preserving Armenian identity, pursuing historical justice, and safeguarding state interests – demonstrating that even a small nation can have a strong voice in the global political system.

Regulations and Oversight of Lobbying in the United States

In the U.S., lobbying is a legitimate channel for participation in the political process, but it also carries significant risks of undue influence, regulatory capture and corruption. Recognizing these risks, U.S. regulation has evolved.

In 1946, the U.S. Congress adopted legislation requiring professional lobbyists active on Capitol Hill to register. Subsequent reforms strengthened and expanded disclosure requirements. In 1995, President Bill Clinton signed

⁷ Armenian Assembly of America, About the Assembly, <https://armenian-assembly.org> accessed on 17.11.2025.

⁸ Ibidem.

⁹ AGBU, *About AGBU Global Network*, <https://agbu.org>. accessed on 17.11.2025.

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the Lobbying Disclosure Act (LDA), which extended registration and reporting obligations to lobbying activities directed at both the legislative and executive branches and required periodic disclosure of lobbying actions.

Following the corruption scandals of the 2000s (notably the Jack Abramoff case),¹⁰ further reforms came. **The Honest Leadership and Open Government Act** of 2007 tightened reporting requirements, introduced “cooling-off” periods for former officials transitioning into lobbying roles, prohibited lobbyists from offering gifts or favors to members of Congress, and mandated electronic reporting and public access to lobbying information. The Act significantly enhanced transparency and accountability.

Additionally, on January 21, 2009, President Barack Obama issued Executive Branch Ethics Guidelines. These measures banned the White House from accepting gifts from lobbyists, imposed two-year post-employment restrictions on certain transitions from government service to lobbying, and required that government hiring decisions be based on professional qualifications rather than political connections.¹¹

Despite these measures, significant challenges remain. “Dark money” continues to flow through **Super PACs (Political Action Committees)** and 501(c)(4) nonprofit organizations, entities designated for “social welfare purposes” that can spend unlimited amounts on political influence while disclosing little to no information about their donors. These mechanisms allow major corporations and private groups to influence elections and legislation anonymously, making transparency difficult to achieve. The “revolving door” also remains ethically problematic: former officials frequently move into lobbying roles, using insider knowledge and professional networks, even when cooling-off periods are in place. These practices, combined with broader perceptions of undue influence, can undermine public trust. Indeed, studies indicate that many U.S. citi-

¹⁰ Jack Abramoff was a prominent lobbyist who influenced Congressional decisions for years.

He was accused of paying millions of dollars in bribes to protect the interests of Indian tribes in casinos, bribing government officials with gifts and trips, tax fraud and money laundering. In 2006, he was sentenced to 6 years in prison. Garry C. Gray, “Insider Accounts of Institutional Corruption: Examining the Social Organization of Unethical Behavior”, *The British Journal of Criminology*, Vol. 53, Issue 4, July 2013, pp. 533–551.

¹¹ Executive Order 13490. “Ethics Commitments by Executive Branch Personnel”, 74 Federal Register 4673. January 26, 2009.

zens believe lobbyists wield disproportionate power, reinforcing the need for effective oversight by civil society organizations such as OpenSecrets, Citizens for Responsibility and Ethics in Washington (CREW), and Transparency International USA.¹²

Implementation of U.S. Lessons in Armenia

The study of U.S. lobbying practices is particularly timely for Armenia in the lead-up to the 2026 parliamentary elections. At present, the Republic of Armenia has **no law** specifically regulating lobbying. A draft law, *“On Lobbying Activities,”* was proposed in 2005 and approved by the government (presented by Deputy Minister of Justice Ashot Abovyan), but it was never adopted by the National Assembly. According to the draft, lobbying would encompass both paid entrepreneurial services and interest-protection activities carried out by public organizations within the scope of their charters. The legislation envisioned accreditation, annual reporting, and registration requirements. However, it was likely not passed due to concerns among the oligopolistic ruling elite at the time about exposing informal decision-making channels.

In the absence of a legal framework, several challenges persist: interest groups remain unregistered, interactions with decision-makers are opaque, and civil society is hindered in engaging systematically. According to the Organization for Economic Cooperation and Development (OECD) Public Integrity Indicators, Armenia meets only 20% of the criteria for lobbying regulation and 11% in practice, compared with OECD averages of 42% and 36%, respectively. Furthermore, Armenia’s 2023–26 Anti-Corruption Strategy envisions legally regulating transparency in interactions with lobbyists by 2025, yet formal adoption of the law remains pending.

From this standpoint, the U.S. experience offers several implications:

1) In the U.S., lobbying is regulated under the *Lobbying Disclosure Act (LDA) of 1995*, which mandates lobbyists to register and regularly disclose their activities, clients, and expenditures to Congress.¹³ For Armenia, institutionalizing

¹² Public Affairs Council, *“2022 Public Affairs Pulse Survey,”* October 2022, Gallup, *“Americans’ Trust in Government Remains Low,”* September 30, 2020.

¹³ U.S. Congress, *Lobbying Disclosure Act of 1995*, Public Law 104–65, 109 Stat. 691 (1995).

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lobbying offers the opportunity to convert informal influence into a transparent and participatory process, thereby strengthening democratic accountability and building a government more responsive to citizen interests. To succeed, reforms must combine legal clarity, public access, equal participation, and civil-society oversight. By adapting the U.S. experience – and incorporating international best practice – Armenia can enhance its anti-corruption resilience and move toward a more transparent decision-making ecosystem ahead of the 2026 parliamentary elections. In the U.S., lobbying is regulated under the *Lobbying Disclosure Act (LDA) of 1995*, which mandates lobbyists to register and regularly disclose their activities, clients, and expenditures to Congress.¹⁴

2) Furthermore, the American experience shows that lobbying is not merely a privilege of large corporations but also a tool for civic groups, minorities, and professional associations to influence policymaking. For instance, organizations such as *AARP* and *Environmental Defense Fund* have successfully advanced social and environmental agendas through structured advocacy. Armenian NGOs and professional chambers could likewise develop formal lobbying arms to voice societal concerns more effectively. This would foster a pluralistic political environment where decisions reflect a broader range of interests.

3) Institutionalizing lobbying in Armenia would also help curb informal influence and corruption. According to Transparency International, while Armenia has made progress in anti-corruption reforms, informal networks and opaque decision-making persist. Legalizing and regulating lobbying could replace these informal exchanges between business and government with traceable, accountable, and publicly accessible interactions. This approach aligns with the principles outlined in the OECD Guidelines on Lobbying, which emphasize integrity, transparency, and equal access to policymakers.¹⁵

To implement these reforms, Armenia could establish a *National Register of Lobbyists* supervised by the *Commission on Prevention of Corruption*. Public officials should be required to disclose meetings with registered lobbyists, and sanctions should apply for non-compliance. Training programs for civil servants,

¹⁴ U.S. Congress, *Honest Leadership and Open Government Act of 2007*, Public Law 110–81, 121 Stat. 735 (2007).

¹⁵ Transparency International, *Corruption Perceptions Index 2024: Armenia Country Report*, Berlin, 2024.

journalists, and NGOs could promote understanding of legitimate lobbying practices, further increasing transparency and public trust.

Conclusion

Lobbying in the United States is a dual-edged phenomenon: it serves as a legitimate channel for public participation while also carrying significant ethical, political, and corruption risks. Legislative reforms in 1995 and 2007 improved transparency, yet new informal mechanisms such as dark money and revolving doors continue to challenge accountability. The scale and institutionalization of lobbying demonstrate that it is far more than campaign contributions; it constitutes a major industry of influence. Without proper oversight, lobbying can evolve into a shadow power within the political system.

The U.S. lobbying model, anchored in regulation, disclosure, and civic engagement, offers valuable lessons for Armenia. While direct transplantation of American mechanisms may not be feasible given contextual differences, adapting its core principles could substantially strengthen Armenia's democratic resilience, enhance transparency, and promote more inclusive policymaking.

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Ամփոփում

Սույն հոդվածը ուսումնասիրում է լոբբինգի ինստիտուտը ԱՄՆ-ում՝ ներկայացնելով նրա պատմական զարգացումը, կարգավորման իրավական շրջանակը և իրական ծավալները՝ միաժամանակ մատնանշելով Հայաստանի Հանրապետությունում ամերիկյան փորձի կիրարկման կարևորությունը: Առաձնական ուշադրություն է հատկացվել ԱՄՆ-ում հայ լոբբիստական կազմակերպությունների գործունեությանը: ԱՄՆ-ում լոբբինգը ձևավորվել է որպես տնտեսական և քաղաքական գործունեության վիթխարի ոլորտ, որն իր հետ բերել է ինչպես ժողովրդավարական լայն հնարավորություններ, այնպես էլ կոռուպցիոն փորձություններ: Հայաստանը, դրան հակառակ, մինչ օրս չունի լոբբինգի ամբողջական և արդյունավետ իրավական կարգավորում՝ չնայած որ այն հակակոռուպցիոն քաղաքականության կարևոր դրույթներից մեկն է:

Հոդվածում հիմնավորվում է այն գաղափարը, որ Հայաստանը կարող է օգտվել լոբբինգի ամերիկյան մոդելի մի շարք բաղադրիչների ներդրման հաջողված փորձից՝ հատկապես թափանցիկության, լոբբիստների գրանցման, հանրային հասանելիության և վերահսկողության մեխանիզմների արդյունավետ կիրարկման օրինակներից՝ դրանք համապատասխանեցնելով երկրի ինս-

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տիտուցիոնալ, ժողովրդավարական և մշակութային առանձնահատկություններին:

Հոդվածում ներկայացվում են մի շարք առաջարկություններ Հայաստանում լոբբինգի կարգավորման հարցում նախատեսվող հետագա բարեփոխումների ուղղությամբ:

Բանալի բառեր՝ *Լոբբինգ, ԱՄՆ, հակակոռուպցիոն քաղաքականություն, լոբբիստական խմբեր ԱՄՆ-ում, սփյուռքահայ լոբբիստական կազմակերպություններ, Հայաստանի Հանրապետություն, լոբբինգի վերահսկողություն:*