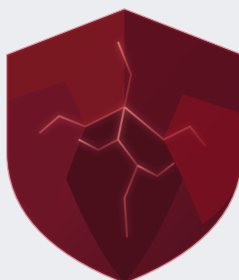


CONSTITUTIONAL EROSION ANALYSIS SYSTEM



EO_14215.PDF

EO 14215 — Multi-Model Comparison Report

AVG THREAT LEVEL: MODERATE [57/100]

Models Compared: glm-5 • gpt-4o-mini • deepseek-r1-0528 • qwen3.5-397b-a17b • kimi-k2.5
• deepseek-v3.2 • gemini-3-flash-preview

Models Analyzed

7

Score Range

45 - 72

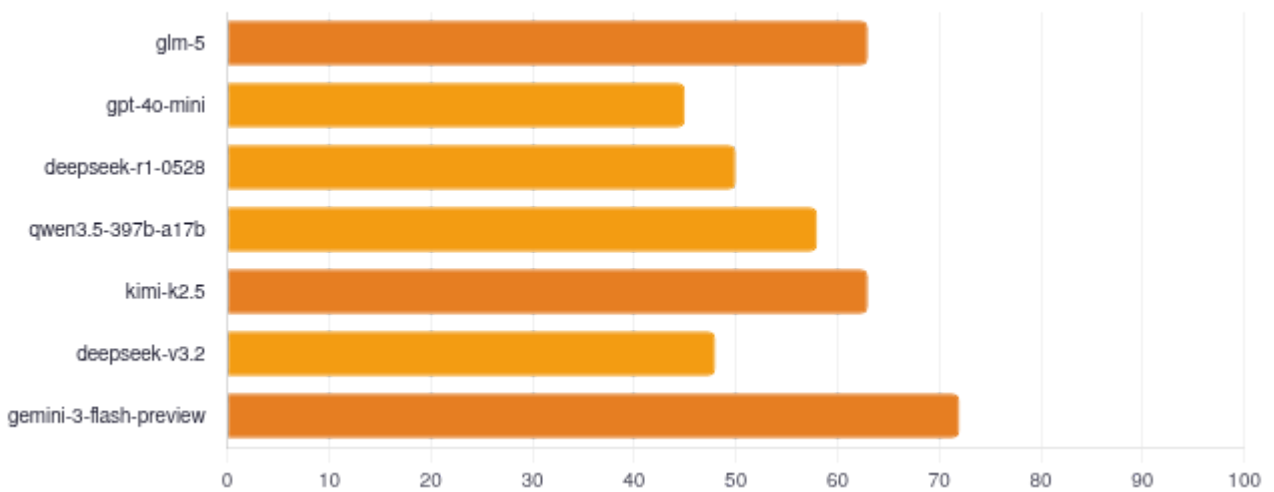
Model Agreement

91%

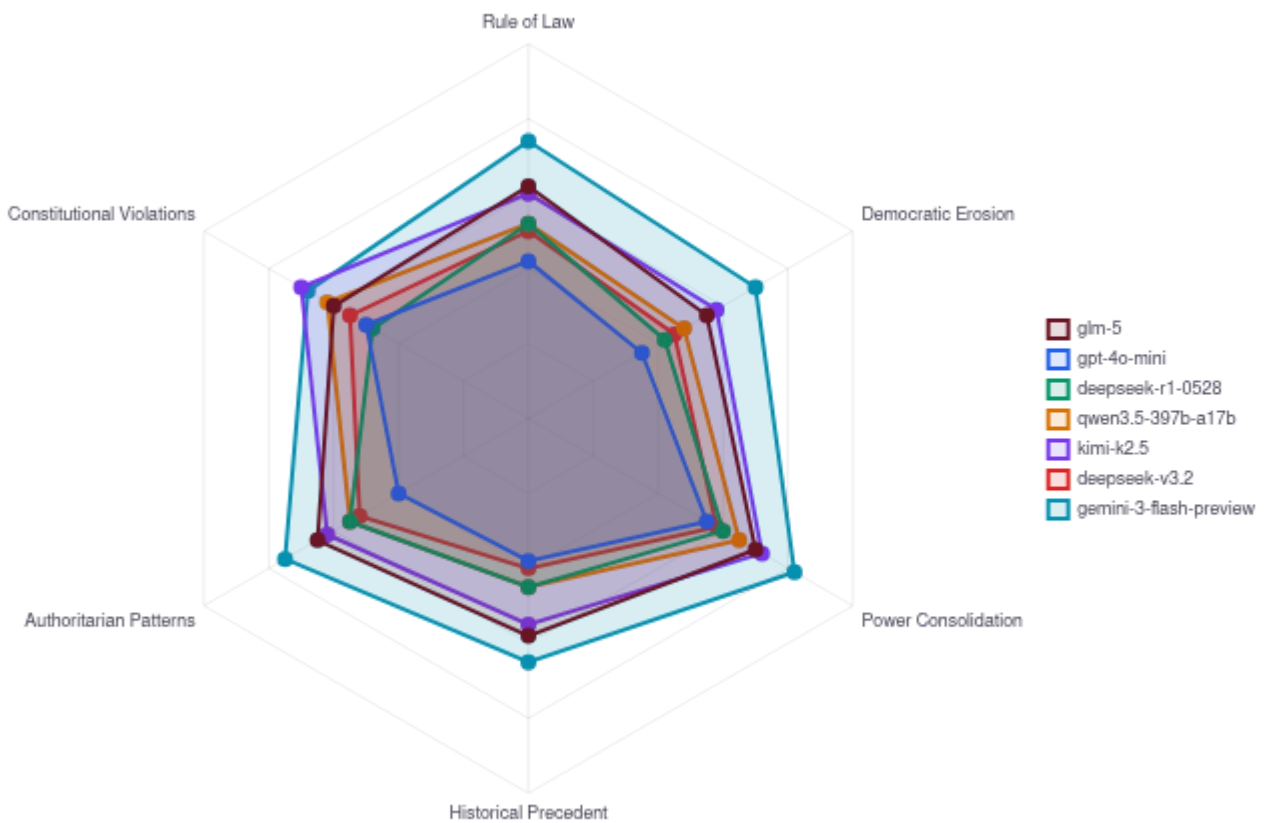
Generated

February 23, 2026

Overall Score Comparison



Framework Score Comparison (Radar)



Models Compared

7

Average Score

57

Score Range

45–72

Model Agreement

91%

Highest Score

72
gemini-3-flash-
preview

Lowest Score

45
gpt-4o-mini

Consensus Scorecard

Average scores across 7 models per framework, with agreement levels and outlier detection.



Rule of Law



⚠️ [gpt-4o-mini](#) scored lower (42) · ⚠️ [gemini-3-flash-preview](#) scored higher (74)

42–74

spread: 32pts



Democratic Erosion



⚠️ [gpt-4o-mini](#) scored lower (35) · ⚠️ [gemini-3-flash-preview](#) scored higher (70)

35–70

spread: 35pts



Power Consolidation



⚠️ [gemini-3-flash-preview](#) scored higher (82)

55–82

spread: 27pts



Historical Precedent



⚠️ [gemini-3-flash-preview](#) scored higher (65)

38–65

spread: 27pts



Authoritarian Patterns



⚠️ [gpt-4o-mini](#) scored lower (40) · ⚠️ [gemini-3-flash-preview](#) scored higher (75)

40–75

spread: 35pts



Constitutional Violations



⚠️ [deepseek-r1-0528](#) scored lower (48) · ⚠️ [kimi-k2.5](#) scored higher (70)

48–70

spread: 22pts

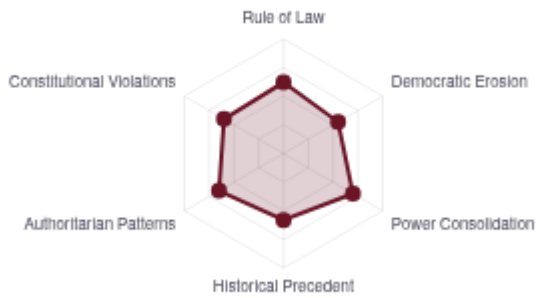
Model Comparison Matrix

Score heatmap across all 7 models and 6 analysis frameworks. Color intensity indicates threat level.

Framework	glim-5	gpt-4o-mini	0528 deepseek-r1-	a17b qwen3.5-397b-	kimi-k2.5	deepseek-v3.2	flash-preview gemini-3-	AVG
Rule of Law	62 HIGH	42 MODERATE	52 MODERATE	52 MODERATE	60 MODERATE	50 MODERATE	74 HIGH	56 AVG
Democratic Erosion	55 MODERATE	35 LOW	42 MODERATE	48 MODERATE	58 MODERATE	45 MODERATE	70 HIGH	50 AVG
Power Consolidation	70 HIGH	55 MODERATE	60 MODERATE	65 HIGH	72 HIGH	58 MODERATE	82 CRITICAL	66 AVG
Historical Precedent	58 MODERATE	38 LOW	45 MODERATE	45 MODERATE	55 MODERATE	40 LOW	65 HIGH	49 AVG
Authoritarian Patterns	65 HIGH	40 LOW	55 MODERATE	55 MODERATE	62 HIGH	52 MODERATE	75 HIGH	58 AVG
Constitutional Violations	60 MODERATE	50 MODERATE	48 MODERATE	62 HIGH	70 HIGH	55 MODERATE	68 HIGH	59 AVG
OVERALL THREAT	63 HIGH	45 MODERATE	50 MODERATE	58 MODERATE	63 HIGH	48 MODERATE	72 HIGH	57 AVG

Threat Level: Minimal Low Moderate High Critical

Framework Scores



Rule of Law	62
Democratic Erosion	55
Power Consolidation	70
Historical Precedent	58
Authoritarian Patterns	65
Constitutional Violations	60

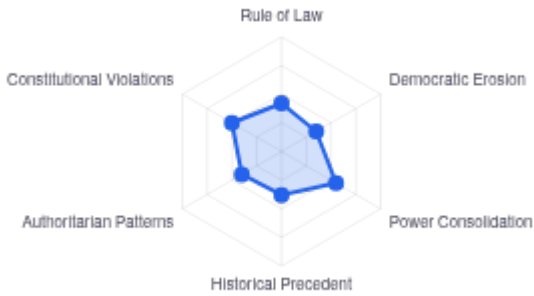
Executive Summary

Executive Order 14215 represents a coordinated effort to dismantle the structural independence of regulatory agencies that Congress created to be insulated from direct presidential control. The order employs multiple mechanisms—regulatory review, budget manipulation, performance standards, mandatory political liaisons, and control over legal interpretations—to bring agencies like the FTC, FCC, SEC, and most concerning, the Federal Election Commission, under direct presidential authority. Section 7's provision making presidential legal interpretations 'controlling on all employees' is particularly dangerous, as it creates a mechanism for the executive to override statutory requirements through unilateral interpretation. While the order includes language about being 'consistent with applicable law,' this is fundamentally undermined by the provision that makes the President's interpretation of what the law requires controlling. This follows documented patterns of democratic backsliding in Hungary and Poland, where 'accountability' rhetoric was used to justify eliminating independent institutions that serve as checks on executive power.

Top Key Findings

- ✓ **[Rule of Law]** Section 7 establishes presidential legal interpretation as supreme within the executive branch, undermining the role of courts and statutory meaning
- ✓ **[Rule of Law]** Creates a system where agencies cannot enforce laws as written if the President disagrees with the statutory interpretation
- ✓ **[Democratic Erosion]** Undermines independent institutions that serve as democratic guardrails against executive overreach

Framework Scores



Rule of Law	<div style="width: 42%;"><div style="width: 42%;"></div></div>	42
Democratic Erosion	<div style="width: 35%;"><div style="width: 35%;"></div></div>	35
Power Consolidation	<div style="width: 55%;"><div style="width: 55%;"></div></div>	55
Historical Precedent	<div style="width: 38%;"><div style="width: 38%;"></div></div>	38
Authoritarian Patterns	<div style="width: 40%;"><div style="width: 40%;"></div></div>	40
Constitutional Violations	<div style="width: 50%;"><div style="width: 50%;"></div></div>	50

Executive Summary

The Executive Order represents a moderate threat to democratic governance by infringing on the autonomy of independent agencies, thereby risking the principles of accountability and checks and balances. While it seeks to improve regulatory coherence, it may lead to an over-centralization of power in the executive branch, undermining democratic norms and the rule of law.

Top Key Findings

- ✓ **[Rule of Law]** The order's stipulations may hinder the rule of law by placing executive interpretations above established legal frameworks.
- ✓ **[Rule of Law]** It directs all employees to follow the President and Attorney General's legal interpretations, limiting legal diversity.
- ✓ **[Democratic Erosion]** Increased presidential oversight of agencies can erode democratic norms by centralizing authority.

Framework Scores



Rule of Law	52
Democratic Erosion	42
Power Consolidation	60
Historical Precedent	45
Authoritarian Patterns	55
Constitutional Violations	48

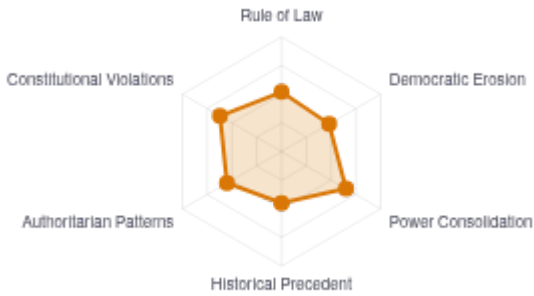
Executive Summary

The order systematically expands presidential control over independent regulatory agencies through budgetary, legal, and procedural mechanisms. While framed as accountability, it fundamentally reshapes congressionally-established independence by: 1) Controlling agency budgets to enforce policy compliance (Sec 5), 2) Mandating legal conformity to White House positions (Sec 7), and 3) Instituting political liaisons (Sec 6b). Though avoiding direct constitutional breaches (Sec 8 disclaimers), it creates significant tension with separation of powers by weakening institutional checks. The exemption for Federal Reserve monetary policy demonstrates awareness of legal boundaries, but the extension to its regulatory functions reveals targeted overreach.

Top Key Findings

- ✓ **[Rule of Law]** Replaces objective legal analysis with political directives
- ✓ **[Rule of Law]** Undermines professional independence of agency counsel
- ✓ **[Democratic Erosion]** Undermines institutional forbearance by overriding congressional designs

Framework Scores



Rule of Law	52
Democratic Erosion	48
Power Consolidation	65
Historical Precedent	45
Authoritarian Patterns	55
Constitutional Violations	62

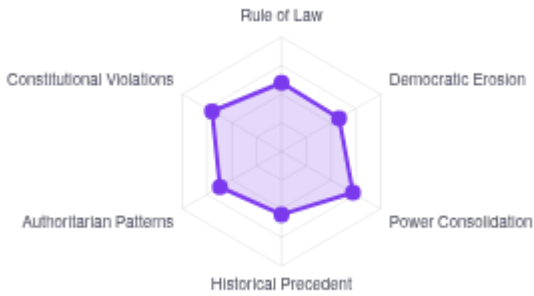
Executive Summary

Executive Order 14215 represents a significant structural shift in US governance, aiming to dismantle the operational independence of federal regulatory agencies. While framed as enhancing democratic accountability through the President, the order concentrates immense power in the White House and OMB, potentially violating the separation of powers and specific statutes establishing agency independence. The most dangerous elements are the mandates for ideological conformity in legal interpretation (Section 7) and the ability to defund specific regulatory activities (Section 5). This moves the US system closer to a 'Unitary Executive' model that leaves few internal checks on presidential will, scoring in the moderate-to-high threat range due to the systemic nature of the changes.

Top Key Findings

- ✓ **[Rule of Law]** Substitution of statutory mandates with Presidential policy preferences via OMB review.
- ✓ **[Rule of Law]** Erosion of the principle that agencies interpret laws based on expertise and statutory text rather than political directive.
- ✓ **[Democratic Erosion]** Weakening of institutional checks and balances designed to prevent single-party dominance over regulation.

Framework Scores



Rule of Law	<div><div style="width: 60%;"></div></div>	60
Democratic Erosion	<div><div style="width: 58%;"></div></div>	58
Power Consolidation	<div><div style="width: 72%;"></div></div>	72
Historical Precedent	<div><div style="width: 55%;"></div></div>	55
Authoritarian Patterns	<div><div style="width: 62%;"></div></div>	62
Constitutional Violations	<div><div style="width: 70%;"></div></div>	70

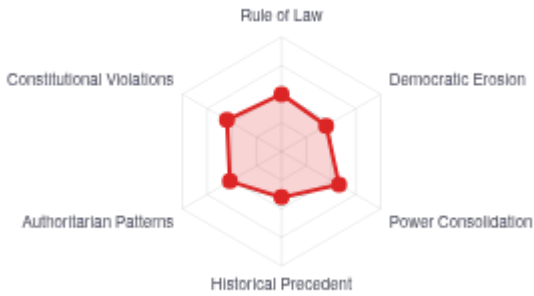
Executive Summary

This document shows moderate constitutional concerns with an overall threat score of 63/100. Key concerns include: The systematic dismantling of agency autonomy through multiple control mechanisms (budgetary, personnel, legal, and procedural) creates a command-and-control executive structure characteristic of authoritarian administrative governance; Section 7's claim that the President and Attorney General can prohibit independent agencies from advancing contrary legal positions in litigation or regulation violates the statutory mandates and quasi-judicial independence of regulatory bodies.

Top Key Findings

- ✓ **[Rule of Law]** Degradation of impartial enforcement by subordinating regulatory decisions to political review
- ✓ **[Rule of Law]** Undermining of procedural regularity through ad hoc presidential control of agency actions
- ✓ **[Democratic Erosion]** Capturing the referees: Bringing independent regulatory commissions (FEC, FCC, FTC, SEC) under direct political control eliminates their role as neutral arbiters

Framework Scores



Rule of Law	<div style="width: 50%;"><div style="background-color: #f4a460;"></div></div>	50
Democratic Erosion	<div style="width: 45%;"><div style="background-color: #f4a460;"></div></div>	45
Power Consolidation	<div style="width: 58%;"><div style="background-color: #f4a460;"></div></div>	58
Historical Precedent	<div style="width: 40%;"><div style="background-color: #4caf50;"></div></div>	40
Authoritarian Patterns	<div style="width: 52%;"><div style="background-color: #f4a460;"></div></div>	52
Constitutional Violations	<div style="width: 55%;"><div style="background-color: #f4a460;"></div></div>	55

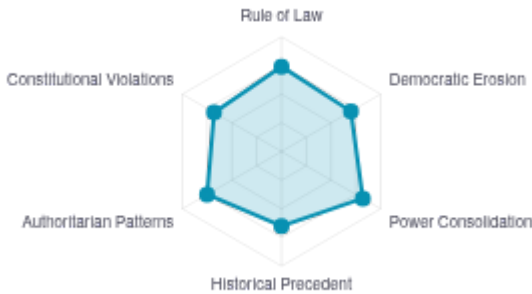
Executive Summary

This executive order represents a significant but incremental step toward presidential consolidation of power over the administrative state. While framed as enhancing accountability, it systematically undermines the independence of regulatory agencies through multiple mechanisms: budgetary control (Section 5), political oversight (Section 6), centralized legal interpretation (Section 7), and expanded regulatory review (Section 3). The order operates within technical legal boundaries while pushing against constitutional norms of agency independence. The exclusion of Federal Reserve monetary policy demonstrates strategic targeting rather than blanket power grab. This represents 'legalistic authoritarianism'—using executive orders to reshape governance structures toward greater presidential control while maintaining procedural legitimacy.

Top Key Findings

- ✓ **[Rule of Law]** Politicization of legal interpretation
- ✓ **[Rule of Law]** Potential for inconsistent application of law based on political priorities
- ✓ **[Democratic Erosion]** Weakening of institutional checks through politicization of regulatory process

Framework Scores



Rule of Law	74
Democratic Erosion	70
Power Consolidation	82
Historical Precedent	65
Authoritarian Patterns	75
Constitutional Violations	68

Executive Summary

Executive Order 14215 represents a structural transformation of the U.S. government from a system of 'independent' regulatory oversight to a centralized 'Unitary Executive' model. By subjecting independent agencies (including the FEC) to OIRA review, OMB budgetary control, and mandatory White House Liaisons, the order effectively terminates the functional independence of the administrative state. The most severe threat lies in Section 7, which establishes the President as the final arbiter of law for all federal employees, potentially forcing civil servants to choose between their statutory duties and Presidential directives. This creates a high risk of politicized enforcement of the law and the erosion of checks and balances.

Top Key Findings

- ✓ **[Rule of Law]** Subordination of statutory law to 'Presidential interpretation.'
- ✓ **[Rule of Law]** Removal of the 'internal separation of powers' within the executive branch.
- ✓ **[Democratic Erosion]** Capturing the referees: Bringing the Federal Election Commission (FEC) under direct White House OIRA review.

Consensus Analysis

Where models agree and disagree across the 7 analyses.

✓ Areas of Agreement (<10pt spread)

No frameworks had close agreement (<10pt spread).

⚠ Areas of Disagreement (≥10pt spread)

⚠ **Democratic Erosion** Range: 35–70 — Spread: **35pts**
High variance between models

⚠ **Authoritarian Patterns** Range: 40–75 — Spread: **35pts**
High variance between models

⚠ **Rule of Law** Range: 42–74 — Spread: **32pts**
High variance between models

⚠ **Power Consolidation** Range: 55–82 — Spread: **27pts**
High variance between models

⚠ **Historical Precedent** Range: 38–65 — Spread: **27pts**
High variance between models

⚠ **Constitutional Violations** Range: 48–70 — Spread: **22pts**
High variance between models

📋 Consolidated Recommendations

Merged and deduplicated across all 7 models — prioritized by how many models suggested each.

Advocate for legislative measures to protect the independence of regulatory agencies.

Suggested by 1 model: gpt-4o-mini

Affected independent agencies should document instances where the order conflicts with their statutory mandates

Suggested by 1 model: glm-5

Civil society organizations should monitor implementation for instances where the order is used to override statutory requirements or manipulate regulatory outcomes for political purposes

Suggested by 1 model: glm-5

Congress should exercise oversight through hearings and consider legislation clarifying and protecting agency independence

Suggested by 1 model: glm-5

Congress should initiate oversight hearings to examine the statutory authority for applying OMB performance standards to independent commissioners.

Suggested by 1 model: qwen3.5-397b-a17b

Congressional legislation to explicitly codify the independence of specific regulatory agencies from OIRA review.

Suggested by 1 model: gemini-3-flash-preview