## A Asymptotic Lower Bound of Shtarkov Complexity for Standard Normal Location Models

We show an asymptotic lower bound of the Shtarkov complexity of standard normal location models.

**Lemma 8** Consider the d-dimensional standard normal location model, given by  $f_X(\theta) = \frac{1}{2} \|X - \theta\|_2^2 + \frac{d}{2} \ln 2\pi$ , where  $X \in \mathcal{X} = \mathbb{R}^d$ . Let  $\gamma = \lambda \|\theta\|_1$  for  $\lambda \ge 0$ . Then we have

$$S(\gamma) \ge d \ln \left( 1 + \frac{e^{-\lambda^2/2}}{\sqrt{2\pi}\lambda^3} (1 + o(1)) \right).$$

**Proof** By definition of  $S(\gamma)$ , we have

$$\begin{split} S(\gamma) &= \ln \int e^{-m(f_X + \gamma)} \nu(\mathrm{d}X) \\ &= d \ln \int_{-\infty}^{\infty} \frac{\sup_{t \in \mathbb{R}} \exp\left[-\frac{1}{2}(x - t)^2 - \lambda \left|t\right|\right]}{\sqrt{2\pi}} \mathrm{d}x \\ &= d \ln \frac{1}{\sqrt{2\pi}} \left[ \int_{-\infty}^{-\lambda} e^{-\lambda(-\lambda - x) - \frac{\lambda^2}{2}} \mathrm{d}x + \int_{-\lambda}^{\lambda} e^{-\frac{x^2}{2}} \mathrm{d}x + \int_{\lambda}^{\infty} e^{-\lambda(x - \lambda) - \frac{\lambda^2}{2}} \mathrm{d}x \right] \\ &= d \ln \left[ 2\Phi(\lambda) - 1 + \frac{2e^{-\lambda^2/2}}{\sqrt{2\pi}} \int_{0}^{\infty} e^{-\lambda x} \mathrm{d}x \right] \\ &= d \ln \left[ 2\Phi(\lambda) - 1 + \sqrt{\frac{2}{\pi}} \frac{e^{-\lambda^2/2}}{\lambda} \right], \end{split}$$

where  $\Phi(\lambda)$  denotes the standard normal distribution function. Now, by Komatu (1955),  $\Phi(\lambda)$  is bounded below with  $\Phi(\lambda) > 1 - 2\phi(\lambda)/(\sqrt{2 + x^2} + x)$  for  $\phi(\lambda)$ being the standard normal density, which yields the lower bound of interest after a few lines of elementary calculation.

## B Lower Bound on Minimax Regret of Smooth Models

We describe how we adopt the minimax risk lower bound as to show the minimax-regret lower bound.

The story of the proof is based on Donoho and Johnstone (1994). First, the so-called three-point prior is constructed to approximate the least favorable prior. Then, since the approximate prior violates the  $\ell_1$ constraint, the degree of the violation is shown to be appropriately bounded to derive a valid lower bound.

The goal of our proof is to establish a lower bound on the minimax regret with respect to logarithmic losses, whereas their proof is about the minimax risk with respect to  $\ell_q$ -loss. Therefore, below we present the proof highlighting (i) an approximate least favorable prior for *logarithmic losses* over  $\ell_1$ -balls and (ii) the way to bound *regrets* on the basis of risk bounds.

Let  $\mathcal{H} = \{\theta \in \mathbb{R}^d \mid \|\theta\|_1 \leq B\}$  be a  $\ell_1$ -ball. Let  $X \sim \mathcal{N}_d[\theta, I_d/L]$  be a d-dimensional normal random variable with mean  $\theta \in H$  and precision L > 0. We denote the distribution just by  $X \sim \theta$  where any confusion is unlikely. Let  $h \in \hat{\mathcal{H}}$  be a predictor associated with any sub-probability distribution  $P(\cdot|h) \in \mathcal{M}_+(\mathbb{R}^d)$ . For notational simplicity, we may write  $f_X(\theta) = \frac{L}{2} \|X - \theta\|_2^2 + \frac{d}{2} \ln \frac{2\pi}{L}$  and  $f_X(h) = \ln \frac{dP(X|h)}{d\nu}$  where  $\nu$  is the Lebesgue measure over  $\mathbb{R}^d$ .

Consider the risk function

$$R_d(h,\theta) \stackrel{\text{def}}{=} \mathbb{E}_{X \sim \theta} \left[ f_X(h) - f_X(\theta) \right],$$

and the Bayes risk function

$$R_d(h,\pi) \stackrel{\text{def}}{=} \mathbb{E}_{\theta \sim \pi} \left[ R_d(h,\theta) \right],$$

where  $\pi \in \mathcal{P}(\mathcal{H})$  denotes prior distributions on  $\mathcal{H}$ . Then, the minimax Bayes risk bounds below the minimax regret,

$$\operatorname{REG}^{\star}(\mathcal{H}) = \inf_{h \in \hat{\mathcal{H}}} \sup_{A \in \mathcal{H}} \sup_{X \in \mathbb{R}^{d}} f_{X}(h) - f_{X}(\theta)$$
  

$$\geq \inf_{h \in \hat{\mathcal{H}}} \sup_{\pi \in \mathcal{P}(\mathcal{H})} \mathbb{E}_{\theta \sim \pi} \mathbb{E}_{X \sim \theta} \left[ f_{X}(h) - f_{X}(\theta) \right]$$
  

$$= \inf_{h \in \hat{\mathcal{H}}} \sup_{\pi \in \mathcal{P}(\mathcal{H})} R_{d}(h, \pi).$$

The minimax theorem states that there exists a saddle point  $(h^*, \pi_*)$  such that

$$R_d(h^*, \pi_*) = \inf_{h \in \hat{\mathcal{H}}} \sup_{\pi \in \mathcal{P}(\mathcal{H})} R_d(h, \pi)$$
  
= 
$$\sup_{\pi \in \mathcal{P}(\mathcal{H})} \inf_{h \in \hat{\mathcal{H}}} R_d(h, \pi) \stackrel{\text{def}}{=} \sup_{\pi \in \mathcal{P}(\mathcal{H})} R_d(\pi),$$

and  $\pi_*$  is referred to as the least favorable prior. We want to approximate  $\pi_*$  to give an analytic approximation of  $R_d(\pi_*)$ , which is a lower bound of  $\operatorname{REG}^*(\mathcal{H})$ .

Let  $F_{\epsilon,\mu} \in \mathcal{P}(\mathbb{R})$  be the three-point prior defined by

$$F_{\epsilon,\mu} = (1-\epsilon)\delta_0 + \frac{\epsilon}{2} \left(\delta_{-\mu} + \delta_{\mu}\right)$$

for  $\epsilon, \mu > 0$ . We show that the corresponding achievable Bayes risk  $R_1(F_{\epsilon,\mu})$  tends to be the entropy of the prior  $F_{\epsilon,\mu}$  in some limit of small  $\epsilon$ .

**Lemma 9** Take  $\mu = \mu(\epsilon) = \sqrt{2L^{-1}\ln\epsilon^{-1}}$ . Let  $H_{\epsilon} = H(F_{\epsilon,\mu}) = (1-\epsilon)\ln(1-\epsilon)^{-1} + \epsilon\ln 2\epsilon^{-1}$  be the entropy of the prior. Then we have

$$R_1(F_{\epsilon,\mu}) \sim H_\epsilon \sim \epsilon \ln \frac{1}{\epsilon}$$

as  $\epsilon \to 0$ . Here,  $x \sim y$  denotes the asymptotic equality such that  $x/y \to 1$ .

**Proof** First, we show the famous inequality on the entropy given by  $R_1(F_{\epsilon,\mu}) \leq H_{\epsilon}$ . Let  $P(\cdot|h) = \mathbb{E}_{\theta \sim F_{\epsilon,\mu}} P(\cdot|\theta) = (1-\epsilon)P(\cdot|0) + \frac{\epsilon}{2}(P(\cdot|-\mu) + P(\cdot|\mu))$  be the Bayes marginal distribution with respect to  $F_{\epsilon,\mu}$ . Then we have

$$\begin{split} H_{\epsilon} &- R_{1}(F_{\epsilon,\mu}) \\ &= H_{\epsilon} - R_{1}(h, F_{\epsilon,\mu}) \\ &= H_{\epsilon} - \mathbb{E}_{\theta \sim F_{\epsilon,\mu}} \mathbb{E}_{X \sim \theta} \ln \frac{\mathrm{d}P(X|\theta)}{\mathrm{d}P(X|h)} \\ &= H_{\epsilon} - (1-\epsilon) \mathbb{E}_{P(X|0)} \ln \frac{\mathrm{d}P(X|0)}{\mathrm{d}P(X|h)} \\ &- \epsilon \mathbb{E}_{P(X|\mu)} \ln \frac{\mathrm{d}P(X|\mu)}{\mathrm{d}P(X|h)} \\ &= (1-\epsilon) \mathbb{E}_{P(X|0)} \ln \left(1 + \frac{\epsilon}{1-\epsilon} \frac{\mathrm{d}P(X|\mu) + \mathrm{d}P(X|-\mu)}{2\mathrm{d}P(X|0)}\right) \\ &+ \epsilon \mathbb{E}_{P(X|\mu)} \ln \left(1 + \frac{1-\epsilon}{\epsilon} \frac{2\mathrm{d}P(X|0) + \mathrm{d}P(X|-\mu)}{\mathrm{d}P(X|\mu)}\right) \\ &\geq 0. \end{split}$$

Now, we show that, with the specific value of  $\mu = \mu(\epsilon)$ , the gap is negligible compared to the entropy itself. Applying Jensen's inequality, we have

$$\begin{aligned} H_{\epsilon} - R_{1}(F_{\epsilon,\mu}) \\ &\leq \epsilon + \epsilon \mathbb{E}_{P(X|\mu)} \ln \left( 1 + (1-\epsilon) \left( 2e^{-L\mu X} + \epsilon^{3}e^{-2L\mu X} \right) \right) \\ &\leq \epsilon (1 + \ln 4 + \mathbb{E}_{P(X|\mu)} \max \left\{ 0, \ -2L\mu X \right\} ) \\ &= \epsilon \left( 1 + \ln 4 + \mathbb{E}_{Z \sim \mathcal{N}[0,1]} \max \left\{ 0, \ 2\sqrt{L}\mu(Z - \sqrt{L}\mu) \right\} \right) \\ &\qquad (\because -\sqrt{L}(X - \mu) = Z) \\ &\leq \epsilon \left( 1 + \ln 4 + 2\sqrt{L}\mu\epsilon \right) \\ &= \epsilon \left( 1 + \ln 4 + 2\epsilon \sqrt{2\ln \frac{1}{\epsilon}} \right) = o(H_{\epsilon}). \end{aligned}$$
  
Thus we get  $H_{\epsilon} \sim R_{1}(F_{\epsilon,\mu}).$ 

Now we show that the *d*-th Kronecker product of  $F_{\epsilon,\mu}$ ,  $F^d_{\epsilon,\mu}$ , can be used to bound the Bayes minimax risk  $R_d(\pi_*)$  with an appropriate choice of  $\epsilon$  and  $\mu$ . To this end, let  $\pi_+ = F^d_{\epsilon,\mu} \mid \mathcal{H}$  be the conditional prior restricted over the  $\ell_1$ -ball  $\mathcal{H}$ .

**Lemma 10** Take  $\epsilon \mu = (1 - c)B/d$  and  $\mu = \sqrt{2L^{-1}\ln\epsilon^{-1}}$  for 0 < c < 1. Then, if  $\epsilon \to 0$  and  $d\epsilon \to \infty$ , we have

$$R_d(\pi_*) \ge R_d(\pi_+) \sim R_d(F_{\epsilon,\mu}^d) \sim d\epsilon \ln \frac{1}{\epsilon}.$$

**Proof** First of all, the inequality is trivial from the definition of  $R_d(\pi)$ . Moreover, the second asymptotic equality immediately follows from Lemma 9.

Now we consider the first asymptotic equality. Let h be the Bayesian predictor with respect to the prior  $F_{\epsilon,\mu}$  and  $h^+$  be the one with respect to the conditional prior  $\pi_+$ . Then we have

$$\begin{aligned} R_d(F_{\epsilon,\mu}^d) &= R_d(h, F_{\epsilon,\mu}^d) \\ &= \mathbb{E}_{\theta \sim F_{\epsilon,\mu}^d} \left[ R_d(h, \theta) \right] \\ &= F_{\epsilon,\mu}^d(\mathcal{H}) R_d(h, \pi_+) + \mathbb{E}_{\theta \sim F_{\epsilon,\mu}^d} \left[ R_d(h, \theta) \cdot \mathbb{1} \left\{ \theta \notin \mathcal{H} \right\} \right] \\ &\geq F_{\epsilon,\mu}^d(\mathcal{H}) \cdot R_d(\pi_+) \end{aligned}$$

and

$$R_{d}(F_{\epsilon,\mu}^{d}) \leq R_{d}(h^{+}, F_{\epsilon,\mu}^{d})$$

$$= \mathbb{E}_{\theta \sim F_{\epsilon,\mu}^{d}} \left[ R_{d}(h^{+}, \theta) \right]$$

$$= F_{\epsilon,\mu}^{d}(\mathcal{H}) \cdot R_{d}(\pi_{+}) +$$

$$\mathbb{E}_{\theta \sim F_{\epsilon,\mu}^{d}} \left[ R_{d}(h^{+}, \theta) \cdot \mathbb{1} \left\{ \theta \notin \mathcal{H} \right\} \right]$$

Let N be the number of nonzero elements in  $\theta \sim F_{\epsilon,\mu}^d$ . Then N is subjects to the Binomial distribution  $\operatorname{Bin}(d,\epsilon)$ . On the other hand, the event  $\theta \in \mathcal{H}$  is equal to  $\{\|\theta\|_1 \leq B\} = \{N \leq B/\mu = \mathbb{E}N/(1-c)\}$ . Therefore, applying the Chebyshev's inequality, we get

$$P_d \stackrel{\text{def}}{=} F^d_{\epsilon,\mu}(\mathcal{H}^c) = \Pr\left\{\frac{N - \mathbb{E}N}{\mathbb{E}N} > \frac{c}{1-c}\right\}$$
$$\leq \frac{(1-c)^2}{c^2 d\epsilon} \to 0.$$

Similarly, we have  $\mathbb{E}\left|N-\mathbb{E}N\right|/\mathbb{E}N\to 0.$  Now observe that

$$\begin{split} & \mathbb{E}_{\theta \sim F^d_{\epsilon,\mu}} \left[ R_d(h^+, \theta) \cdot \mathbb{1} \left\{ \theta \notin \mathcal{H} \right\} \right] \\ & \leq \mathbb{E}_{\theta \sim F^d_{\epsilon,\mu}} \mathbb{E}_{\varphi \sim \pi_+} \left[ R_d(\varphi, \theta) \cdot \mathbb{1} \left\{ \theta \notin \mathcal{H} \right\} \right] . \\ & \leq 2L \mathbb{E}_{\theta \sim F^d_{\epsilon,\mu}} \mathbb{E}_{\varphi \sim \pi_+} \left[ \left( \|\varphi\|_2^2 + \|\theta\|_2^2 \right) \cdot \mathbb{1} \left\{ \theta \notin \mathcal{H} \right\} \right] \\ & \leq 2L \mu^2 \mathbb{E} \left[ P_d N + N \cdot \mathbb{1} \left\{ N > B/\mu \right\} \right] \\ & \quad (\because \|\theta\|_2^2 = \mu^2 N) \\ & \leq 2L \mu^2 \mathbb{E} N \left( 2P_d + \frac{\mathbb{E} \left| N - \mathbb{E} N \right|}{\mathbb{E} N} \right) \\ & = 4d\epsilon \ln \frac{1}{\epsilon} \left( 2P_d + \frac{\mathbb{E} \left| N - \mathbb{E} N \right|}{\mathbb{E} N} \right) . \\ & = o(R_d(F^d_{\epsilon,\mu})). \end{split}$$

Thus, combining all above, we get

$$(1 + o(1))R_{d}(\pi_{+})$$
  
=  $(1 - P_{d})R_{d}(\pi_{+})$   
 $\leq R_{d}(F_{\epsilon,\mu}^{d})$   
 $\leq (1 - P_{d}) \cdot R_{d}(\pi_{+}) +$   
 $\mathbb{E}_{\theta \sim F_{\epsilon,\mu}^{d}} [R_{d}(h^{*}, \theta) \cdot \mathbb{1} \{\theta \notin \mathcal{H}\}].$   
=  $(1 - o(1))R_{d}(\pi_{*}) + o(R_{d}(F_{\epsilon,\mu}^{d})),$ 

which implies the desired asymptotic equality  $R_d(F_{\epsilon,\mu}) \sim R_d(\pi_+)$ .

Summing these up, we have an asymptotic lower bound on the minimax regret which is the same as the upper bound given by the ST prior within a factor of two (see Theorem 7). This implies that both the regret of the ST prior and the Bayes risk of the prior  $\pi_+$  are tight with respect to the minimax-regret rate except with a factor of two.

**Theorem 11 (Minimax lower bound)** Suppose that  $\omega(1) = \ln(d/\sqrt{L}) = o(L)$ . Then we have

$$\operatorname{REG}^{\star}(\mathcal{H}) \gtrsim \frac{B}{2} \sqrt{2L \ln \frac{d}{\sqrt{L}}}$$

where  $x \gtrsim y$  means that there exists  $y' \sim y$  such that  $x \geq y'$ .

**Proof** The assumptions of Lemma 10 are satisfied for all 0 < c < 1 since

$$\epsilon \lesssim \epsilon \sqrt{\ln \frac{1}{\epsilon}} = \frac{1-c}{d} \sqrt{\frac{L}{2}} \to 0,$$
$$d\epsilon = (1-c) \sqrt{\frac{L}{2\ln \frac{1}{\epsilon}}} \sim (1-c) \sqrt{\frac{L}{2\ln \frac{d}{\sqrt{L}}}} \to \infty.$$

Thus, we have

$$\operatorname{REG}^{\star}(\mathcal{H}) \ge R_d(\pi_*) \gtrsim d\epsilon \ln \frac{1}{\epsilon} \sim (1-c) \frac{B}{2} \sqrt{2L \ln \frac{d}{\sqrt{L}}}$$

for all 0 < c < 1. Slowly moving c toward zero completes the theorem.

## C Existence of Gap between LREG<sup>\*</sup> and LREG<sup>Bayes</sup> under $\ell_1$ -Penalty

Below we show that, under standard normal location models, the Bayesian luckiness minimax regret is strictly larger than the non-Bayesian luckiness minimax regret if  $\gamma$  is nontrivial and has a nondifferentiable point. Here we refer to  $\gamma$  as *trivial* when there exists  $\theta_0$  such that  $\gamma(\theta) = \infty$  for all  $\theta \neq \theta_0$ .

**Lemma 12** Let  $f_X(\theta) = \frac{1}{2} (X - \theta)^2 + \frac{1}{2} \ln 2\pi$  for  $X \in \mathbb{R}$  and  $\theta \in \mathbb{R}$ . Then, for all nontrivial, convex and non-differentiable penalties  $\gamma : \mathbb{R} \to \overline{\mathbb{R}}$ ,

$$LREG^{\star}(\gamma) < LREG^{Bayes}(\gamma)$$

**Proof** Let  $\mathcal{F} = \{f_X \mid X \in \mathbb{R}\}$  and recall that LREG<sup>Bayes</sup> $(\gamma) = \inf_{w \in \mathcal{E}(\mathcal{F}_{\gamma})} \ln w [e^{-\gamma}]$  by Theorem 1. Let  $\|\cdot\|_{\gamma}$  be the metric of pre-priors  $w \in \mathcal{M}_+(\mathbb{R})$  given by  $\|w\|_{\gamma} = w [e^{-\gamma}]$ . Owing to the continuity of  $w \mapsto \ln w [e^{-\gamma}]$  and the completeness of  $\mathcal{E}(\mathcal{F}_{\gamma}) \subset \mathcal{M}_+(\mathbb{R})$ , it suffices to show that there exists no preprior  $w \in \mathcal{E}(\mathcal{F}_{\gamma})$  such that  $\ln w [e^{-\gamma}] = S(\gamma)$ . Let us prove this by contradiction. Now, assume that  $\ln w [e^{-\gamma}] = S(\gamma)$ . Observe that

$$0 = w \left[ e^{-\gamma} \right] - \exp S(\gamma)$$
  
=  $w \left[ \int e^{-f_X - \gamma} \nu(\mathrm{d}X) \right] - \int e^{-m(f_X + \gamma)} \nu(\mathrm{d}X)$   
=  $\int \left\{ w \left[ e^{-f_X - \gamma} \right] - e^{-m(f_X + \gamma)} \right\} \nu(\mathrm{d}X),$ 

which means  $w \left[ e^{-f_X - \gamma} \right] = e^{-m(f_X + \gamma)}$  for almost every X since  $w \in \mathcal{E}(\mathcal{F}_{\gamma})$ . Note that  $f_X(\theta)$  is continuous with respect to X, and then we have  $w \left[ e^{-f_X - \gamma} \right] = e^{-m(f_X + \gamma)}$  for all X. After some rearrangement and differentiation, we have

$$0 = \frac{\mathrm{d}}{\mathrm{d}X} w \left[ e^{-f_X - \gamma + m(f_X + \gamma)} \right]$$
$$= w \left[ \frac{\mathrm{d}e^{-f_X - \gamma + m(f_X + \gamma)}}{\mathrm{d}X} \right]$$
$$= w_\theta \left[ (\theta - \theta_X^*) e^{-f_X - \gamma + m(f_X + \gamma)} \right], \qquad (13)$$

where  $\theta_X^* = \arg m(f_X + \gamma)$ . Here we exploited Danskin's theorem at the last equality. One more differentiation gives us

$$0 = \frac{\mathrm{d}}{\mathrm{d}X} w_{\theta} \left[ \left( \theta - \theta_X^* \right) e^{-f_X - \gamma + m(f_X + \gamma)} \right],$$
$$= w_{\theta} \left[ \left\{ \left( \theta - \theta_X^* \right)^2 - \frac{\mathrm{d}\theta_X^*}{\mathrm{d}X} \right\} e^{-f_X - \gamma + m(f_X + \gamma)} \right]$$

for all  $X \in \mathbb{R}$ .

Note that we have  $\frac{d\theta_X^*}{dX}|_{X=t} = 0$  for any nondifferentiable points t of  $\gamma$ . Then it implies that  $w = c\delta_{\theta_t^*}$  where  $\delta_s$  denotes the Kronecker delta measure. Then, according to (13), we have

$$0 = w_{\theta} \left[ \left( \theta - \theta_X^* \right) e^{-f_X - \gamma + m(f_X + \gamma)} \right].$$
  
=  $c \left( \theta_t^* - \theta_X^* \right) e^{-f_X(\theta_t^*) - \gamma(\theta_t^*) + m(f_X + \gamma)},$ 

which means that  $\theta_X^* = \theta_t^*$  is a constant independent of X. However, this contradicts to the assumption that  $\gamma$  is nontrivial.

As a remark, we note that this lemma is easily extended to multidimensional exponential family of distributions.