

From: Robert Zingher [REDACTED]
Sent: Wednesday, February 10, 2016 7:32 PM
To: Rule-Comments
Subject: revised rule petition 4-695

4-695-2

Robert D. Zingher, BS, MBA (Acctg)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

By Electronic Mail

February 10, 2015

Mr. Brent J. Fields
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: Petition 4-695 for SEC Rulemaking to advance from just comparative columnar format, **per 17 CFR § 229.301**, to also include diagramming of account relationships (DOAR) within financial statements to improve investor's identification of financial data that operates or would operate as a fraud or deceit upon purchasers or the market due to misrepresentation or omission about each publicly traded company

Dear Secretary - Brent Fields
Chief of Rulemaking – Division of Corp. Fin. – Felicia Kung,

By this Petition, and in accordance with 17 CFR 229.301 of the Securities and Exchange Commission ("Commission") rules - Standard Instructions for Filing Forms and as an accountant for better financial information operating against fraud or deceit upon investors, I respectfully request that the Commission take swift action to promulgate rule(s) to make the market less susceptible to fraud or deceit based on columnar financial data. Columnar financial data hides account fiscal relationships which DOAR diagramming of account relationships would reveal. DOAR rules would improve the protection of investors, maintain fair, orderly, and efficient markets, and facilitate capital formation.

Selected financial data section, 17 CFR 299.3011, states [to] "furnish in comparative columnar form the selected financial data for the registrant." A comparative columnar financial format has been an excellent 20th century fiscal tool which presumes that financial accounts exist in

isolation. Financial statements present end-of period account values without consideration of the relationship to one or more other accounts. DOAR shows the relationships among accounts and the accumulated values disclosed in the financial statement. Audited financial statements with DOAR diagrams “lowers the bar” and makes financial data less susceptible to fraud or deceit upon instrument purchasers and upon the wider market, due to misrepresentation or omission in disclosed data.

The SEC fraud rule, 17 CFR § 240 10 b-5, emphasizes after-the-fact curing of fraud-on-the-market or common fraud. DOAR is a superior approach which proactively makes misrepresentation or omissions within financial statements more obvious and therefore less likely to operate as fraud or deceit upon instrument purchasers or the market.

DOAR diagramming (visual patterning with statistical relationship values) is being proposed to eliminate deniability or reasonable doubt about relationships, ratios, and the significance of those ratios or statistics related to the financial statements. The diagram can show the account relationships and multiple account relationships with account ratios and other relevant statistics. A side-bar can be required that describes the normative range of the ratios and statistics for that industry. Should one or more ratios indicate impropriety, the inconvenient ratios cannot be changed or omitted, as these ratios are numerically linked to the financial statements. In so doing, traded corporations will have substantial pressure not to commit financial statement fraud or corporate impropriety (malfeasance). With disclosed relationships and ratios articulated for the trading public, rational investors will have revealing information about potential investment to support their due diligence efforts. Corporate impropriety may be squeezed-out or otherwise prevented from harming the investing community by presenting the revealing statistics within the relationship diagrams that append to the financial statement.

Due to the growth in computer capacity, DOAR account disclosure and the DOAR vocabulary is a selective combination of 1) “T” account diagramming protocols and 2) UML (Universal Mark-Up Language) protocols. UML is symbol dictionary for engineering diagrams. Three technical monographs are needed to define the conventions of DOAR. A registrant’s financial statement will explain in a diagram format the elements, account relationships and statistics of the entity. The diagram could be presented as either a single comprehensive DOAR diagram or multiple DOAR diagrams about each facet of the entity. To an observer a single comprehensive DOAR diagram might resemble an architectural building drawing or an integrated circuit drawing. Multiple DOAR diagrams could be issued on a single page format with each page showing a specific grouping of related accounts. The first outstanding technical monograph would define the critical ratios (and statistics) needed to document fraud, manipulation, error or omission within the financial statement or within the related entity. Second, a technical monograph is needed to apportion the unified diagram of the entity’s relationships into account groupings. Third, a dictionary of visual conventions for DOAR vocabulary, symbols, colors and language will need to be defined, so that DOAR diagrams will need to read alike based on a common visual language, format and rules.

Through rulemaking for DOAR financial statement diagramming, the Commission will provide a disclosure mechanism to protect investors, maintain fair, orderly, and efficient markets, and facilitate capital formation.

Sincerely,

Robert D. Zingher, B.S., B.S.(Acctg), M.B.A.(Acctg), Fellow(Cost)

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