

Michael Brozzetti, Esq., CIA

May 1, 2011

Comment Regarding File No. S7-33-10: Proposed Rules for *Implementing the Whistleblower Provisions of Section 21F of the Securities Exchange Act of 1934*

Dear SEC Constituency:

With respects to the U.S. Securities and Exchange [Canon of Ethics](#), the [Standards of Ethical Conduct for Employees of the Executive Branch](#) and other Related Statutory Authorities (collectively the “Code of Ethics,”) and its fundamental relevance for carrying out the spirit of the Sarbanes-Oxley and Dodd-Frank Laws, I respectfully submit the following two (2) recommendations:

RECOMMENDATION #1: ETHICS ACKNOLWEDGEMENTS

The Commission shall make available to the public, without fee, a searchable index of records granting access to the signed acknowledgements to the Code of Ethics for each public official and public employee.

RECOMMENDATION #2: PUBLIC RECORD SYSTEM

The Commission shall make available to the public, without fee, a searchable index of records granting access to the Code of Ethics incident reports and opinions, including concurring and dissenting opinions, as well as orders, made in connection with the adjudication of matters relating to the Code of Ethics.

I further recommend that the records include, but not be limited to, the following:

- Official incident report number (unique identifier)
- Date incident first reported
- Description of incident
- Official title(s) of person(s) involved.
- Supporting documents/summary findings
- Official opinion(s) rendered *and* its reasoning
- Date incident closed and made available to the public
- Person (and department) responsible to ensure proper handling of the incident report

I respectfully request that the Commission take these measures as an essential safeguard to assure that the activities of the government will continue to perform legally, ethically, and sustainably.

Sincerely,



Michael Brozzetti, Esq., CIA

DISCLOSURE: Michael Brozzetti, Esq., CIA is an Auditor-at-Fact and not an Attorney-at-Law. Michael uses the Esq., CIA designation to represent his personal commitment to protect and guard the Internal Auditing profession's principles for *integrity, competency, confidentiality, and objectivity* as provided for within the Institute of Internal Auditors Code of Ethics. Michael Brozzetti is President of Boundless LLC, an expert internal auditing and governance firm and is Chairman of the Business Integrity Alliance™ which is a joint venture between zEthics, Inc. and Boundless LLC missioned to advocate and advance the practices supporting the principles of integrity, transparency, accountability, and risk oversight. Michael Brozzetti is a Certified Internal Auditor® Learning System training partner with the Institute of Internal Auditors, Villanova University, and the Holmes Corporation. Michael Brozzetti is currently under consideration for the zEthics, Inc. Board of Directors. Michael has no material holdings in the Capital Markets.