

Michael Brozzetti, Esq., CIA

May 5, 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 United States Securities & Exchange Commission and constituency:

With respects to the U.S. Securities and Exchange (the "Commission") [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 mission to protect investors, maintain fair, orderly, and efficient markets, and facilitate capital formation, I respectfully request that the following amendment be made to my recommendations made on May 1, 2011.

**RECOMMENDATION #3: PUBLIC RECORD SYSTEM - INCIDENT MANAGEMENT**

The Commission shall make available to the public, without fee, a searchable index of records granting access to all summary reports regarding the handling of all enforcement tips, complaints, and incidents of fraud or wrongdoing involving potential violations of the securities laws reported to the Commission or other entities within its jurisdiction, including but not limited to, the Public Company Accounting Oversight Board (PCAOB), and the Financial Industry Regulatory Authority (FINRA.) On behalf of Mr. Mark Rome, a Business Integrity Alliance founder and member it is recommended that the records include, but not be limited to, the following:

- Official incident report number (unique identifier)
- Date incident first reported
- Internal chain-of-custody for each incident, including official title and operating unit for SEC individual responsible to ensure proper handling of the incident report
- Description of incident
- Contact information for individual(s) or company(ies) mentioned in the incident
- Official title(s) of individual (s) mentioned in the incident
- Supporting documents/summary findings
- Litigation Release number, Admin Proceeding number, Investigation Release number, Commission Opinion and Adjudicatory Order Release number, and/or Trading Suspension Release number, when applicable
- Official opinion(s) rendered *and* its reasoning, including concurring and dissenting opinions, as well as orders, made by the SEC
- Date incident report number closed

I kindly ask the Commission consider these measures as a 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.