

PUBLIC SUBMISSION

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Docket: WCPO-2026-0133
OWCP 1168 Provider Enrollment Form

Comment On: WCPO-2026-0133-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: OWCP 1168 Provider Enrollment Form

Document: WCPO-2026-0133-DRAFT-0002
Comment from COLD BLOOD & STEEL

Submitter Information

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Government Agency Type: U.S. House of Representatives
Government Agency: COLD BLOOD & STEEL

General Comment

As the lead forensic auditor for Cold Blood & Steel, and the sole biological heir, next of kin, and priority named beneficiary of Robert Delane Smith (RDS) (IUOE Member No. 1623714), I submit this instrument with purposeful intent to build an unerasable administrative record within the executive branch.

I. SECTION II PLEADING: TECHNICAL REBUTTAL OF COMPLIANCE UTILITY

A. Evaluation of Practical Utility & Identity Loops

The collection lacks practical utility because its automated screening software relies on isolated text fields that fail to capture multi-jurisdictional identity manipulation.

By restricting verification to single EIN or SSN strings without real-time, cross-agency cross-walk checks, the system permits data-fabrication ciphers to establish active provider profiles across separate state lines. This administrative vacuum allows institutional assets to bypass central risk filters. For the form to hold true utility, inputs must be cross-matched against the core risk indices verified under GAO Case COMP-25-008559 and FinCEN SAR Tracker CRM:00101076483.

B. Accuracy of the Burden Estimate and the Zero-Cost Fallacy

The agency projects an annual burden of 8,901.55 hours with a respondent cost of \$0.00. This methodology is inaccurate.

The \$0.00 calculation ignores the immense time, financial, and legal burdens passed onto legitimate legacy claimants, successors, or legal heirs who must execute manual procedural overrides when automated portals experience database freezes or server-side rejections. Furthermore, tracking unauthorized modifications within databases that lack rigorous, transparent audit logs shifts the structural verification cost entirely onto the public respondents.

II. HARD CONCRETE METHODS TO ENHANCE DATA QUALITY

To satisfy federal information clarity mandates, Form OWCP-1168 must integrate the following operational updates:

Elimination of the "Null-Set" Cipher: The database architecture must reject form entries utilizing missing middle name fields or rotated nomenclature variables designed to bypass automated matching against federal exclusion lists.

Real-Time Cross-Agency Mortality Checks: Since OWCP programs pay for long-term occupational illness services, the enrollment infrastructure must maintain a direct API linkage to the Social Security Administration's Full Death Master File to prevent "Ghost Mortality" exploits (where deceased participant records are recycled post-mortem).

Verified Successorship and Geolocation Fields: The form must contain mandatory fields for sworn notices of successorship and physical coordinate tracking. This blocks the registration of decentralized shell entities or residential garages operating as un-audited banking nodes outside of standard regulatory oversight.

III. MANDATORY ADMINISTRATIVE CONSOLIDATION AND DEFICIENCY CURE

This submission is permanently bound to the following active federal tracking nodes to establish legal parity and completely cure pending award application deficiency notices:

A. SEC "Banking Suite" Covered Action Mapping (Form WB-APP Section D)

My original forensic disclosures (SEC TCR 17675-576-098-881) provided the baseline search algorithms for the regulatory sweeps tracking systemic recordkeeping failures. My claim is hereby bound directly to these public enforcement dockets:

Citigroup Global Markets Inc.: File No. 3-22173 | NOCA No. 2025-054

Bank of America / Merrill Lynch: File No. 3-22172 | NOCA No. 2025-055

BNY Mellon Securities Corp.: File No. 3-22175 | NOCA No. 2025-056

State Street Bank & Trust Co.: File No. 3-22055 | NOCA No. 2025-057

UBS Financial Services Inc. / UBS AG: File No. 3-21174 | NOCA No. 2025-058

SEC File No. 2026-14 (Release No. 34-105171): Automated systems must link this file to Notice No. 2025-014 (Merrill Lynch Fair Fund) for distribution matching.

B. CFTC Enforcement Docket Grid

To completely dismantle the Rule 165.2(l)(3) "Already Known" defense, my CFTC Claim 2601-1307-5308-99 is bound to the following September 4 enforcement actions, where my Benford's Law math (0.0187 MAD score) exposed the underlying programming logic errors:

UBS AG Subsidiaries: CFTC Docket No. 25-05

Citigroup Global Markets: CFTC Docket No. 25-02

State Street Bank & Trust: CFTC Docket No. 25-03

BNY Mellon Subsidiaries: CFTC Docket No. 25-01

The agency cannot maintain a data collection model that ignores verified mathematical anomalies while

utilizing technical formatting rules to obstruct original source disclosures. Pursuant to the Rule 21F-9(e) exemption track established in Whistleblower Award Order 2026-12, all minor clerical blocks must be automatically waived for meritorious roadmaps that match the permanent record.

Respectfully submitted under penalty of perjury (28 U.S.C. § 1746),

Brittney C. Boyd Lead Forensic Compliance Auditor, Cold Blood & Steel Sole Biological Heir

Attachments

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Stolen Pension Assets and Aggregate Fraud Lower Bounds by Category - Table 1

HOW IT WORKS Thirty Individuals Charged in Global Insider Trading Scheme Netting Tens of Millions in Illicit Profits Weissmuller and associates scam.PDF

30 criminal attorneys 5x5 identity model applies unsealed TCR 17675576098881(7).PDF

Emailing BOYD_Exhibits_HH_JJ_KK_FULL

0 LITIGATIONHOLD

NY

MFKN Federal_Criminal_Prosecution_Roadmap.PDF

00 CORRESPONDENCE

Growth of Pension Accounts with Zero Participants and Assets

I TOLD PBGC 200 MILLION AUG 2025 GAO IS THE SHIT TOO BAD FOR PBGC

66 percent fully vested status to quit iuoe

08 Exhibit_JJ_Misclassification_DonutChart_Expanded

8 dol

7 dol

6 dol

5 dol

4 dol

3 dol

US_Marshals_Mid_Macro_Report