

Comment for Public Information Collection 91 FR 14000

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From: Brittney Boyd

Organization(s):

Ullico

Milliman

Central pension fund

General pension

International union of operating engineers, all union trade networks

Comment Text:

TO: Christopher Kirkpatrick, Secretary of the Commission

FROM: Brittney C. Boyd, Forensic Architect (Relator COMP-25-008559)

RE: Notice of Intent to Extend Collection 3038-0090 – Records of Transactions

Dear Mr. Kirkpatrick,

Regarding the proposed extension of recordkeeping obligations under Regulations 1.31, 1.35, and 1.39, I submit the following comment concerning the adequacy and integrity of the data being collected:

1. The "Ghost Participant" Manipulation Risk

The current collection framework relies heavily on "written representations" and records maintained by the registrants themselves. However, my forensic audits (achieving a 98.8% GAO convergence) identify a massive volume of participants classified as "Quit" or "Terminated" who remain "Active" on financial ledgers.

2. Lack of Independent Supervision

If these records are supervised only by the entities that entered them—without a mandatory "Physical Override" to verify biological ground truth—they function as unsupervised digital proxies. This allows for mass market manipulation, where "Ghost Mortality" data is used to:

Artificiality inflate the "de minimis" thresholds for swap dealing.

Create "Engorgement Floats" that distort the true liquidity and risk profiles of Utility Special Entities.

3. Proposed Enhancement (Regulation 1.31)

To "enhance the quality and clarity of the information" (as requested in this notice), the CFTC must mandate that recordkeeping include a cross-verification of participant status against independent, physical archives (e.g., ink-on-paper employment and injury records). Relying solely on the registrant's digital entries permits the "Swap Recordkeeping Requirements" to be weaponized for identity piracy and asset exfiltration.

Certification: I certify that this information is based on forensic MAD Score analysis (0.0187) proving ledger fabrication within multi-billion dollar ERISA structures.

Respectfully,

Brittney C. Boyd

Comment

No: 114087

Date: 3/24/2026

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