Thank you. My name is Jamie Martin. I reaffirm my earlier submissions and offer eight additional safeguards for the rulemaking record.

My earlier comments addressed what the rules should require. Today I am asking what happens when those requirements are ignored, bypassed, or marked complete without anyone checking.

An independent investigator cannot fix a complaint that was rejected before reaching that investigator. A public order cannot protect anyone if nobody verifies compliance. The rules need checks at those points.

First, require conflict disclosures throughout the process.

The redline removes Board members from the express impartiality provision, although a motion for their excusal remains. It also moves the motion deadline from twenty to forty-five days before the hearing or meeting. Please explain why.

Require written disclosure of material employment, supervisory, financial, family, and close personal relationships when someone is assigned to screen, investigate, negotiate, recommend, or decide a case. Require a recorded recusal decision and an independent substitute when necessary.

Permit challenges based on conflicts discovered after the ordinary deadline. The public should not have to uncover a relationship the decision maker already knows about, and then be told it was discovered too late.

When the Board rejects a hearing officer's findings, especially on witness credibility, require it to identify the record reviewed and explain the evidence supporting its different conclusion. Decision makers should certify that they reviewed the necessary record. A vote must not turn someone else's summary into a substitute for the evidence.

Second, make missed deadlines trigger action outside the inactive office.

The redline deletes the thirty-day deadline for recommending a decision after a response. What replaces it?

A deadline needs an automatic next step. When an action becomes overdue, notify the complainant and an unconflicted reviewer. Require an explanation, a corrective deadline, and reassignment for repeated or unjustified delay. Preserve the original due date. Moving it must not erase the failure.

Also require urgent-risk assessment at intake. Designate who receives an allegation of immediate danger and who must promptly decide whether to invoke available emergency procedures. Routine scheduling must not substitute for that assessment.

Third, make evidence preservation automatic and verifiable.

On receipt of a complaint reasonably identifying relevant evidence, issue a documented preservation notice and stop routine deletion of that evidence. Name the custodians and require confirmation that the hold was implemented.

Preserve native recordings, original reports, revisions, metadata, and access histories. Record what was requested, received, transferred, and still missing. If material was destroyed or cannot be located, require an explanation of when that happened and an independent assessment of the loss.

A duty to supplement a report later offers little protection if the recording is deleted while officials decide whether the complaint deserves attention.

Fourth, let complainants correct material factual errors before dismissal.

Before a nonurgent closure, provide a lawfully shareable explanation of the proposed reasons and fifteen calendar days to identify errors or supply overlooked evidence. Address material corrections in the final disposition.

If a decision relies on the assertion that a recording does not exist, ask the person who may have it. If an agency summary misquotes the complainant, allow that discrepancy to be demonstrated before treating the summary as reliable.

This is an accuracy check. The Board still decides the outcome, and legally confidential information remains protected.

If software or artificial intelligence helps screen or summarize submissions, retain the original and identify the human who verified the result. No adverse decision should rest solely on an automated summary. Material errors must be traceable and correctable.

Fifth, protect people who cooperate with oversight.

Adopt an express prohibition, within the Board's authority, on retaliation for good-faith complaints, truthful testimony, evidence preservation, or cooperation with an investigation. Provide a reporting route outside the accused person's chain of command and prompt review of alleged reprisals.

Do not condition complaint processing or corrective action on withdrawing a complaint or surrendering lawful reporting rights.

Evaluate the evidence in a complaint even when its author is angry, writes informally, or uses assistance to prepare it. A polished agency response must not receive greater evidentiary weight merely because it sounds more comfortable.

Sixth, settlements must produce enforceable obligations.

The redline replaces a mandatory notice of contemplated action after settlement noncompliance with language authorizing the Board to pursue remedies. I request a mandatory, documented enforcement response to a material breach, with the required process.

Every agreement needs specific conditions, deadlines, a monitoring official, proof of performance, and consequences for noncompliance. Publish its lawful public terms and explain its disposition.

A settlement must not suppress mandatory reporting, authorize destruction of required records, or create a clean employment reference that contradicts the underlying record.

Distinguish dismissal, settlement, surrender, and exoneration. An agreement without an admission does not establish guilt, but it must not be presented as a finding that nothing happened.

Seventh, verify that ordered conditions were actually completed.

Where an order lawfully permits a later return, identify the source document proving each requirement, the person who independently checked it, and the date clearance was authorized. This does not alter my request for a permanent bar following final revocation.

For corrective training, verify the required assessment and demonstrated competence. A certificate of attendance establishes attendance. It does not, by itself, establish that the problem was corrected.

Do not lift an outstanding restriction merely because time passed or the employing agency supplied an unsupported assurance.

Finally, independently audit the process.

Require periodic samples of complaints rejected at intake, dismissed after investigation, resolved by settlement, and left overdue. Let an independent reviewer select the sample and compare decisions against source records.

Publish quarterly aggregate results: missed deadlines, missing evidence, undisclosed conflicts, omitted notices, and unfulfilled conditions. Identify corrective actions, responsible officials, and completion dates. Protect confidential information while showing whether the system followed its own rules.

A searchable database displays outcomes. An audit asks whether those outcomes can be trusted.

Please address these additional requests individually in the rulemaking response. If authority is missing, identify the specific statutory change needed. Confirm that this supplement is included in the record.

The public should not have to become the missing enforcement mechanism for your rules. Build that enforcement into the process. Thank you.

Jamie Martin

She/Her/Hers

And the judge initially "would not," but because she **continually came**, he eventually answered her.
Luke 18:3–5