

July 28, 2011

Office of the Executive Secretariat and Regulatory Affairs
U.S. Department of Interior
1849 C Street, NW
Washington, DC 20240

Complaint of Scientific and Scholarly Misconduct

Complainant: Filed on behalf of Dr. Charles Monnett, PhD, a wildlife biologist with the U.S. Bureau of Ocean Energy Management, Regulation and Enforcement (BOEM) by undersigned of Public Employees for Environmental Responsibility (PEER). Dr. Monnett coordinates a significant portion of all BOEM extramural research and a majority of BOEM research on Arctic wildlife and ecology. He had Contracting Officer's Representative duties managing approximately \$50 million worth of studies.

Complaint Summary: Several recent actions taken against Dr. Monnett violate the Department of Interior (DOI) policy on Integrity of Scientific and Scholarly Activities (Part 305; Chapter 3 DOI Manual), specifically:

a) Dr. Monnett's significant scientific activities have been completely disrupted, in violation of the policy against "outside interference" with scientific work (§ 3.5 L). He has been forbidden from conducting any scientific work, contacting colleagues or entering BOEM premises under threat of disciplinary action. (See Attachment I) This open-ended professional banishment not only prevents Dr. Monnett from doing work but substantially interferes with a number of on-going research projects.

b) Dr. Monnett has been subjected to "a significant departure from accepted practices of the relevant scientific and scholarly community" (§ 3.5 M), in that –

- i. He has been placed on administrative leave and suspended from his Contracting Officer's Representative duties due to "an on-going inquiry" from the Interior Department of Inspector General (IG) yet Dr. Monnett has not been informed of any specific charge or question relating to the scientific integrity of his work (see Attachment II);
- ii. The IG is apparently reviewing a 2006 note authored by Dr. Monnett and a colleague and published in 2006 in the peer-reviewed journal *Polar Biology*

(Attachment III). This note had undergone informal internal peer review, formal management review by the then Minerals Management Service (MMS) chain-of-command and outside peer review coordinated by the editors of *Polar Biology*. The aforementioned IG investigation, however, is being conducted by criminal investigators who have no scientific training, background or understanding of the scientific issues they are investigating; and

- iii. In the course of this investigation, IG agents seized Dr. Monnett's computer hard-drive, notes, papers and equipment. Although his hard drive was returned within a few weeks, despite repeated requests, IG agents did not return his other materials, further hindering his work.

In short, despite newly minted policies to protect scientific integrity and DOI scientists from political interference, DOI officials have actively persecuted Dr. Monnett, acted on hearsay and rumors, gratuitously tarnished his reputation and substantially disrupted important scientific research.

These actions violate core DOI Scientific integrity principles, including:

- Intentionally hindering the scientific and scholarly activities of others, in violation of § 3.7A (6);
- Failing to “examine, track, and resolve all reasonable allegations of scientific and scholarly misconduct while ensuring the rights and privacy of those covered by this policy and ensuring that unwarranted allegations do not result in slander, libel, or other damage to them,” in violation of § 3.4 L; and
- DOI decision-makers engaging in “coercive manipulation” and other activities which have negatively affected “the planning, conduct, reporting, or application” of Dr. Monnett's extensive scientific activities, in violation of § 3.7 C(1).

As detailed below, this misconduct was “committed intentionally, knowingly, or recklessly” and is supported by “a preponderance of evidence”, as stipulated in § 3.5 M(3).

Subjects of this Complaint: It is our contention, based upon our examination of the record, that the following DOI officials are guilty of Scientific and Scholarly Misconduct:

1. BOEM Director Michael Bromwich, BOEM Alaska Regional Director (Acting) James Kendall, Deputy Regional Director Jeffery Loman and other agency officials involved in the decision to terminate Contract Officer's Representative status for Dr. Monnett on on-going studies, issuing stop-work orders on others and placing Dr. Monnett on indefinite administrative leave on the basis of information not shared with Dr. Monnett and absent any due diligence inquiry into the validity of this information; and

2. IG Special Agent Eric May and his chain-of-command responsible for a) continuing a multi-month investigation into a more than 5-year old peer reviewed publication well after it became apparent that no falsification or other scientific misconduct by Dr. Monnett could be identified, let alone verified; b) communicating unverified concerns or findings to Dr. Monnett's chain-of-command; and c) refusing to promptly return papers and equipment seized from Dr. Monnett, the absence of which impeded Dr. Monnett in his scientific activities.

Requested Relief: We request that BOEM immediately reinstate Dr. Monnett to his previous duties and status. We request that the IG either drop its investigation of Dr. Monnett or expeditiously pursue it by specifying charges of scientific misconduct through the process laid out in the DOI Manual (see § 3.8). We also demand that BOEM and the IG each issue a public statement of apology to Dr. Monnett for their misconduct. We further ask that the responsible officials in these agencies be appropriately disciplined.

The Record:

For years, MMS biologists have annually counted bowhead whales sighted in North America's Arctic waters. Bowheads are targeted in the aerial survey, which involves numerous flight-days, but the team's researchers routinely note the presence of other marine mammals, including seals, walrus and polar bears, along with fluctuations detected in the region's sea ice.

In 2004, Dr. Monnett was the team leader for this "Bowhead Whale Aerial Survey Project." During those flights that year, Dr. Monnett also acted as an observer, as did an MMS colleague, Dr. Jeffrey Gleason. That year, they observed an unusual number of polar bears swimming in ocean, then, following a major storm which grounded flights, they sighted four floating polar bear carcasses.

These occurrences were recorded in contemporaneous notebooks and photos of one floating bear were taken.

When the survey project was complete, at first Drs. Monnett and Gleason did not realize the significance of what they had seen, but in speaking with current and retired colleagues, they came to realize that what they had seen was quite unusual, if not unprecedented.

In 2005, they decided to author a "note", an anecdotal account of their observations with a short scientific discussion of possible implications of these sightings. After composing a short article they circulated it among colleagues both inside and outside MMS, including some of the world's most eminent polar bear researchers. After incorporating this input, they submitted it for official MMS management review. The article received MMS management approval, up through the then Alaska regional Director, John Goll.

It should be noted that MMS management review was not *pro forma* as there was extreme sensitivity at this time to any publication that might point to the existence of climate change, especially as it might affect the Arctic region.

With official approvals secured, Drs. Monnett and Gleason submitted the article, entitled “Observations of mortality associated with extended open-water swimming by polar bears in the Alaskan Beaufort Sea,” to the well regarded peer review journal *Polar Biology* in April 2005. The *Polar Biology* editors subjected their article to an external anonymous peer review. In December 2005, the journal accepted it for publication and it appeared in the 2006 edition.

The published article, including footnotes, is less than seven pages long. This short note, and two related poster presentations at scientific societies, soon attracted national and even international attention, which connected the findings in the article with climate change.

Both authors began receiving negative feedback and harassment from their MMS chain-of-command, including instructions that they could not answer questions about the article. Soon thereafter, Dr. Gleason left MMS, accepting a lower-grade position with another agency.

To lower his profile, Dr. Monnett decided to take his name off of all future publications and to concentrate on managing a growing portfolio of very important research projects.

On February 4, 2011, Dr. Monnett received an email from IG Special Agent Eric May requesting an interview. Dr. Monnett twice asked Agent May to specify in writing the subject of the investigation but Agent May demurred.

On February 14, 2011, Dr. Monnett received a “Compelled Interview Notice” from his immediate BOEM supervisor (Attachment IV) which stated; “It has come to my attention that the Office of Inspector General is conducting an investigation into allegations of administrative misconduct by you and others in the Bowhead Whale Aerial Survey Project.” The notice directed Dr. Monnett to make himself available for an interview with IG agents on February 23, 2011 in the Anchorage BOEM offices.

At that interview, it became clear that the focus of the investigation was the 2006 *Polar Biology* journal note, though it remained unstated what had sparked an IG investigation of a peer-reviewed article more than five years after its publication (See IG Interview Transcript, Attachment V).

Early in the interview, it was established that the two IG special agents conducting the investigation had no scientific background or training:

CHARLES MONNETT: Okay, and, and just so I know how to put my answers, do you have scientific credentials of any sort? Uh, what, what, what level of scientist am

I speaking with here that's going to be evaluating my science?

ERIC MAY: No, we're criminal investigators.

CHARLES MONNETT: Criminal investigators.

ERIC MAY: With the Inspector General's Office.

LYNN GIBSON: Right.

CHARLES MONNETT: So I assume with no formal training in, in science or biology or -

LYNN GIBSON: That's correct.

ERIC MAY: That's right.

CHARLES MONNETT: - marine, marine biology (inaudible/mixed voices).

LYNN GIBSON: That's correct.

ERIC MAY: That's correct, right.

CHARLES MONNETT: All right, thanks. [IG Interview Transcript at page 4]

It became apparent that the two criminal investigators had a questionable grasp of the nature of the allegations against Dr. Monnett or how to investigate them. Due to a total lack of scientific background, the agents did not realize that the *Polar Biology Journal* was an observational note, not a study. Nor did they realize that the discussion section of a note invites speculation of possible meanings.

Repeatedly, the agents were hindered by misunderstanding basic math concepts. For example, Agent May asked about whether the note's "stats" were peer-reviewed and this exchange ensued:

ERIC MAY: Did they comment at all about any of the stats or -

CHARLES MONNETT: Uh, there's no stats in there.

ERIC MAY: Well, calculations, for, for example, the 25 percent survival rate.

CHARLES MONNETT: Oh, well, that's just a mindless thing. That's in the discussion. Um, that is not a statistic. Um, that's a ratio estimator. It's a, it's a fifth grade procedure. Do you have kids?

ERIC MAY: No.

CHARLES MONNETT: Okay, well, if you had kids, you would know that in about fifth grade, they start doing a thing called cross multiplication. "X" is to "Y" as, you know, "N" is to "M." And you can - there's, there's a little procedure you use to compare the proportions. And so that's a, um, simply a calculation. It's not a statistic.

ERIC MAY: Okay.

CHARLES MONNETT: And, uh, we were very careful, um, in how we presented that, to first make it clear that

we had - we didn't have sufficient sample size, although a, a, a peer statistician type would probably argue we did. But we felt we didn't have a sufficient sample size to do statistics and, you know, and to estimate, to do any estimators or confidence intervals or anything like that on. And we put caveats throughout that section, saying that, uh, "it's possible." And we felt that, um, we didn't want to leave the reader thinking that, "Okay, they went out, and they surveyed it, and there were four dead bears." Because this is a survey, and it only looks - it only covers a small part of the habitat.

When you're out there flying in an airplane, uh, over this vast area, our transects were 100 kilometers or longer, many cases, and we were surveying an area 500, you know, kilometers wide. We appreciated that we had a very limited, you know, scope in this thing. We were only looking at a small percentage of it, and so we thought that it would be worthwhile, uh, letting them know essentially that we only looked at about 10 percent of the area. And so if you just kind of draw a circle around the area where the dead bears were, then if we looked at 10 percent of the area, um, it's reasonable to think that if they're distributed randomly, which we don't have any reason not to think they are, that we would see 10 percent of what's there. And that's a standard thing that's, um, used all the time and sometimes very rigorously.

ERIC MAY: Okay.

CHARLES MONNETT: But you, but you have to state your assumptions, which, you know, I think we did, so -. And that's - that hasn't been controversial. Nobody, nobody's really complained about that that I'm - that I recall anyway. [IG Interview Transcript at pages 37-8]

Later, it became clear that the IG agents were focused on what in their mind was a disparity but was, in fact, their inability to understand the note. The issue was how many dead bears had been observed floating in open waters:

ERIC MAY: Well, actually, since you're bringing that up, and, and I'm a little confused of how many dead or drowned polar bears you did observe, because in the manuscript, you indicate three, and in the poster presentation -

CHARLES MONNETT: No.

ERIC MAY: - you mentioned four.
CHARLES MONNETT: No, now you're confusing the, um, the estimator with the, uh, the sightings. There were four drowned bears seen.
ERIC MAY: Okay.
CHARLES MONNETT: Three of which were on transects.
ERIC MAY: Okay.
CHARLES MONNETT: And so for the purpose of that little ratio estimator, we only looked at what we were seeing on transects, because that's a - you know, we couldn't be very rigorous, but the least we could do is look at the random transects. And so we based, uh, our extrapolation to only bears on transects, because we're saying that the transects, the, the swaths we flew, represented I think it was 11 percent of the entire habitat that, you know, that could have had dead polar bears in it.
ERIC MAY: Um-hm [yes].
CHARLES MONNETT: And, um, so by limiting it to the transect bears, then, you know, we could do that ratio estimator and say three is to, um, uh, "x" as, uh, 11 is to 100. I mean, it's that kind of thing. You, you've, you're nodding like you understand.
LYNN GIBSON: Yeah.
CHARLES MONNETT: Yeah, that's pretty simple, isn't confusing. I mean, it's -
ERIC MAY: So, so, so you observed four dead polar bears during MMS -
CHARLES MONNETT: One of which was not on transect.
ERIC MAY: Okay, so that's what -
CHARLES MONNETT: Yeah.
ERIC MAY: So is that considered an MMS survey, the one that was not?
CHARLES MONNETT: Yeah, because when we go out there, we don't - we aren't just limited to flying transects. We have to get there.
ERIC MAY: Okay.
CHARLES MONNETT: And we connect. We go between transects.
ERIC MAY: Right. [IG Interview Transcript at pages 43-4]

But despite saying that he understood, Agent May did not understand. Later in this interview this exchange illustrated that the investigation was premised on illusory points:

ERIC MAY: Three dead polar bears?
CHARLES MONNETT: Yeah, three dead.

ERIC MAY: Right.
CHARLES MONNETT: But the four swimming were a week earlier.
ERIC MAY: Okay.
CHARLES MONNETT: And, um, then we said if they accurately reflect 11 percent of the bears present so, in other words, they're just distributed randomly, so we looked at 11 percent of the area.
ERIC MAY: In that transect?
CHARLES MONNETT: Yeah.
ERIC MAY: Right.
CHARLES MONNETT: In, in our, in our area there, um -
ERIC MAY: Right.
CHARLES MONNETT: - and, therefore, we should have seen 11 percent of the bears. Then you just invert that, and you come up with, um, nine times as many. So that's where you get the 27, nine times three.
ERIC MAY: Where does the nine come from?
CHARLES MONNETT: Uh, well 11 percent is one-ninth of 100 percent. Nine times 11 is 99 percent. Is that, is that clear?
ERIC MAY: Well, now, seven of 11 - seven of what number is 11 percent? Shouldn't that be - that's 63, correct?
CHARLES MONNETT: What?
ERIC MAY: So you said this is -
CHARLES MONNETT: Seven/11ths this is -
ERIC MAY: No, no, no, no, no. This, this is, this is 11 - seven is what number of 11 percent?
CHARLES MONNETT: Seven?
ERIC MAY: Yeah.
CHARLES MONNETT: Is what number of 11 percent?
ERIC MAY: Eleven percent, right.
CHARLES MONNETT: Well, I don't know. I don't even know what you're talking about. It makes no sense.
[IG Interview Transcript at pages 51-2]

Agent May persisted but as the interview wore on it became less and less clear just what credible allegations prompted this investigation, as illustrated by this exchange:

ERIC MAY: "If seven total bears, four swimming, uh, and three drowned represents 11 percent of the population" -
CHARLES MONNETT: It doesn't.
ERIC MAY: Okay, and we'll - let me, let - "of bears before the storm, then the total number of bears after

the storm is 63," and that's where I came up with the sixty -

CHARLES MONNETT: That's just stupid. I - did you do that?

ERIC MAY: No.

CHARLES MONNETT: That is stupid.

ERIC MAY: I'm a, I'm just - I interview -

CHARLES MONNETT: In the first place, there's - it's 200 percent, okay?

ERIC MAY: So explain - tell me why that's wrong.

CHARLES MONNETT: Well, because they're acting like they were all seen at the same survey. We flew the whole thing twice to see that, right?

ERIC MAY: Right, and that's, that's different.

CHARLES MONNETT: Yeah.

ERIC MAY: That's where the mistake is here -

CHARLES MONNETT: Yeah.

ERIC MAY: - because they -

CHARLES MONNETT: Yeah.

ERIC MAY: - they - it occurred on different trips.

CHARLES MONNETT: Yeah, it, it, it's, it's three out - uh, three is to 11 to 100 percent, and then four is to 11 to 100 percent. It's another 100 percent. And so I, I don't even still follow what they did to get the 60 percent. That, that's -

ERIC MAY: The 63 percent.

CHARLES MONNETT: Yeah, that's just goofy.

ERIC MAY: Okay.

CHARLES MONNETT: But you should at least be - if you were trying to, uh, uh, document the rate at which we saw something, dead or swimming, it would be seven out of 200 percent. [IG Interview Transcript at page 60]

After a few more minutes of mystifying questions from the IG agents, they indicated they were about to conclude. This exchange then occurred with one of the PEER legal team, Executive Director Jeff Ruch:

JEFF RUCH: Um, but, uh, Agent May indicated to, um, us all that he was going to lay out what the allegations are, and we haven't heard them yet, or perhaps we don't understand them from this line of questioning.

ERIC MAY: Well, the scientif- - well, scientific misconduct, basically, uh, wrong numbers, uh, miscalculations, uh -

JEFF RUCH: Wrong numbers and calculations?

ERIC MAY: Well, what we've been discussing for the last hour.

JEFF RUCH: So this is it?

CHARLES MONNETT: Well, that's not scientific misconduct anyway. If anything, it's sloppy. I mean, that's not - I mean, I mean, the level of criticism that they seem to have leveled here, scientific misconduct, uh, suggests that we did something deliberately to deceive or to, to change it. Um, I sure don't see any indication of that in what you're asking me about.

ERIC MAY: No, no, no further comment on my part. We, we're - I'm just about complete with my - the interview, so -

CHARLES MONNETT: Really? Oh, good. That's it?

ERIC MAY: Like I said, we receive allegations; we investigate.

CHARLES MONNETT: Don't you wonder why somebody that can't even do math is making these allegations and going through this stuff? [IG Interview Transcript at pages 83-4]

After this interview, the IG Agents made arrangements to seize Dr. Monnett's computer hard drive, notebooks and other materials. At that time, the agents indicated they would copy them and return them within a month. Months passed and Dr. Monnett sent Agent May emails inquiring when he could have his materials and equipment back, as their loss impeded his work. Dr. Monnett received no substantive response.

Finally, in an email dated June 28, 2011 (Attachment VI), Agent May wrote:

"Sorry for the delay in my response. I wanted to know if you would be available on either July 12th or 13th sometime in the morning for a follow-up interview. At that time, I can also return your materials. If your [sic] not available, no worries, I will be back in Anchorage in mid to late August. Thanks!!"

Dr. Monnett responded that he was on a family vacation on those dates but would be available after he returned. Apparently Agent May and/or other IG representatives decided they could not wait because, according to BOEM officials, the IG was conveying concerns about Dr. Monnett in July 2011. A BOEM notice to Dr. Monnett dated July 13, 2011 informed him that his Contracting Officer's Representative role for a major study was terminated "effective immediately." The cited basis for the action was unspecified "Information raised by the Department of Interior Office of Inspector General in an on-going inquiry causes us to have concerns about your ability to act" in the COR role.

The next day, one of his research contractors informed Dr. Monnett that he had received a stop-work order on a scientific study that was completed except for the writing of the final report. (In this study, the Principal Investigator is still monitoring tagged bears with

his own money) Dr. Monnett heard from other researchers with whom he was working expressing concern about the level of disruption being experienced in ongoing scientific work.

Then on July 18, 2011, Dr. Monnett received a notice from Deputy BOEM Regional Director Jeffery Loman that he was placed on administrative leave “effective immediately...pending the final results of an Office of Inspector General (OIG) investigation into integrity issues.”

Dr. Monnett was told to collect his personal effects from his office within the next two hours and was then escorted off the premises. During his indefinite administrative leave, Dr. Monnett is forbidden under threat of “disciplinary action” from entering any DOI facilities, attending any DOI functions or engaging in “any communication (including telephone, email, etc.)” with any scientific colleagues with whom he had been working whether inside or outside DOI.

In effect, Dr. Monnett has been placed under professional house arrest. His scientific work and career have been rudely interrupted. With each passing week, his ability to pick up the reins on multiple projects will lessen.

To add insult to injury, DOI officials have announced to his colleagues that “integrity issues” necessitated his immediate removal and suspension without identifying what those issues are or giving him a chance to answer.

Argument:

Dr. Monnett has been subjected to a Star Chamber procedure where he does not know what allegations have been made, yet is being treated as guilty. He has been subjected to a multi-month investigation in which all of his emails have been examined, his notes seized and his colleagues interrogated. He now is suspended, under orders not to speak with or see his colleagues.

The treatment of Dr. Monnett is the antithesis of what the new DOI Scientific Integrity Policy is supposed to produce. And while the events related in this complaint occurred after this DOI Policy went into effect, its provisions were repeatedly violated.

The policy lays out procedures for “reporting and resolving allegations in a timely and fair manner” (§ 3.8) yet both the IG and BOEM ignored this process.

By contrast, the conduct of the IG has been ham-handed and, on the questions of science, utterly clueless. A fair reading of the IG interview transcript can only support the conclusion that there is no credible, or even coherent, allegation of scientific misconduct against Dr. Monnett.

In this instance, not only is the source of the allegations against Dr. Monnett unknown but so are the allegations themselves. The DOI rules provide that the subject will be informed of the allegation and “will be protected” thorough the inquiry (§ 3.8 D). No one

could fairly assert that Dr. Monnett is now being protected, unless referring to protective custody.

If there is merit to the allegation, the review is supposed to be conducted by a Scientific Integrity Review Panel – not by criminal investigators lacking any scientific knowledge or understanding.

Perhaps most importantly, no one to our knowledge has accused Dr. Monnett of falsifying observations of polar bears (alive or dead) in open waters. These observations were witnessed by others and contemporaneously entered into notebooks. Unless Dr. Monnett is accused of falsifying these observations, the issues raised by the IG (assuming there is any merit) are not punishable. As §3.5 M(1) provides: “Scientific and scholarly misconduct does not include honest error or differences of opinion.”

The investigation and suspension of Dr. Monnett, however, is not an innocent bureaucratic mix-up. It is our belief that it is a political attempt to interfere with science. Dr. Monnett is overseeing an extensive portfolio of research on a range of Arctic ecology issues (see Attachment VII). Suspending Dr. Monnett disrupts a significant portion of the BOEM extramural research program at precisely the moment when these studies’ results will be most needed to inform agency decision-making. It is precisely the type of political interference that supposedly gave rise to the new DOI Scientific Integrity Policy.

DOI agencies do not suspend employees every time there is an IG investigation (if they did, there would be even more empty cubicles in the agency). Why did BOEM take action against Dr. Monnett before the IG inquiry was finished?

For that matter: Why is there an extensive investigation in 2011 of a peer reviewed journal note from 2006? The IG is not compelled to investigate every allegation and often declines to review meritorious allegations based upon a variety of considerations, including staleness.

The answer is this article’s impact on the climate change debate, especially as it affects the Arctic. The reason the note received so much attention is that it made climate change impacts in the Arctic understandable to the average layman and, in so doing, made the polar bear an icon of the climate change debate. It is also the reason that such elaborate efforts are underway all these years later to undermine it.

In their interviews of other witnesses in this matter, the IG agents have asked questions about the involvement of former Vice President Al Gore because he cited the study in his book and movie, *An Inconvenient Truth*. They have focused on the amount of media attention the note received – matters which should be beyond the stated scope of their inquiry.

Science is supposed to be provocative. The DOI policies promise to promote scientific inquiries undertaken in good faith. Contrary to that promise, Dr. Monnett is not being encouraged to publish or to pursue scientific inquiries. Instead, he has been harassed

from the moment this article appeared until today. As he explained at the end of the IG interview:

CHARLES MONNETT: Yeah, well, we got blasted, you know, really, uh, hard, you know, by this agency when, when this finding came out, and if you've been digging in my emails, and I don't know if you've dug in my emails, or it's just Jeff Loman selecting it, but you'll see a lot of emails there, uh, from management to me telling me that I can't function as a biologist. I'm not allowed to talk about this paper or our findings. I'm not allowed to talk to the media. I can't, you know, I can't do these things.

And, and they really dumped on us, um, uh, when this things came out, and then that, um - uh, and, and some other, um, manipulation and restrictions that Jeff got hit with caused him to bail out of here, and he, he took a cut from a GS-13 to a GS-11 position to go to the Fish and Wildlife Service. . . .and he was looking for any job and, you know, because I think he felt that, uh, the Alaska Region is kind of special in the way it treats its scientists.

ERIC MAY: Hm. Well, I'm - uh, any more questions on -

LYNN GIBSON: No, no. [IG Interview Transcript at pages 94-5]

The IG's utter lack of interest in the question of scientists facing reprisal for reporting scientific observations is telling. The gist of this complaint, however, is precisely what the IG chooses to ignore: An immensely talented and extremely valuable government scientist is today suffering harassment, interruption of his work, defamation and blatantly singular treatment because he had the temerity to report scientific observations on a matter that became controversial.

If the DOI Scientific Integrity Policy is worth the paper it is written on, it should be invoked today to protect Dr. Charles Monnett.

Respectfully submitted,

Jeff Ruch
PEER Executive Director