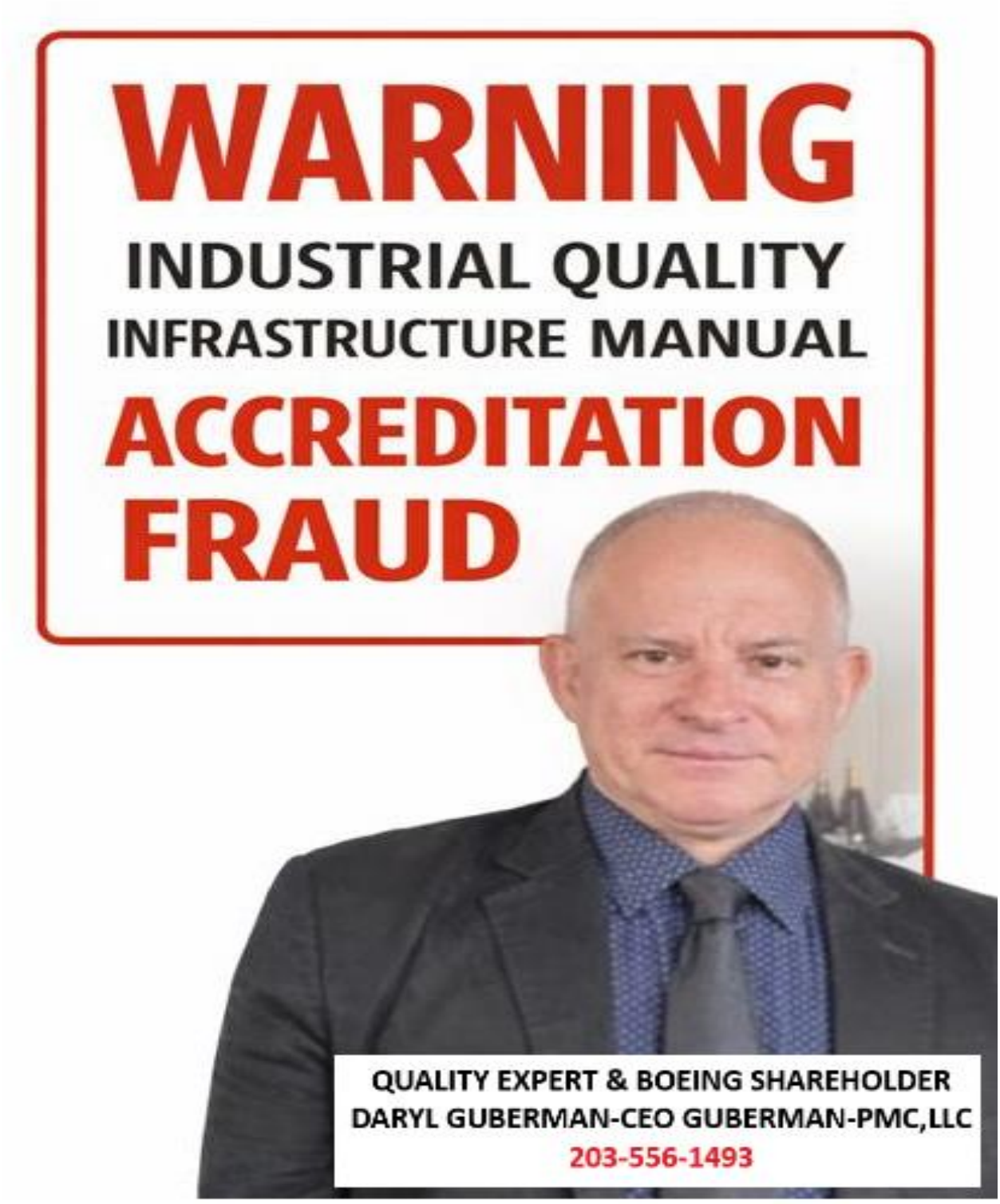

Industrial Quality Infrastructure Manual

How Accreditation Fraud from 2018 to Present Has Compromised Every Stage of the Ore-to-Bolt Chain

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Chapter 1: Introduction — The Quality Infrastructure Crisis

This manual covers the full industrial quality infrastructure from raw material extraction deep underground to the finished aerospace fastener installed on the flight line. It traces every stage of the ore-to-bolt manufacturing chain and documents, with forensic precision, how systemic accreditation fraud has compromised the integrity of every certificate, every test report, and every quality management system operating under the global accreditation umbrella.

The thesis of this manual is direct and unambiguous: **Since 2018, the entire global accreditation system has been compromised by fraud originating at the ANAB/ANSI level, propagated through MRA/MLA equivalency agreements administered by the IAF and ILAC, and now inherited — without correction — by the newly formed Global Accreditation Cooperation Incorporated (GLOBAC), which assumed operations on January 1, 2026.**

This is not a theoretical risk assessment. This is a documented fraud on a U.S. federal contract — Contract **19AQMM18R0131** issued by the U.S. Department of State — in which the ANSI National Accreditation Board (ANAB) was falsely described as an "underwriter" for the International Accreditation Forum (IAF). No such role exists in any IAF or ILAC governance document. No accreditation body possesses underwriting authority. The claim is false, it is documented in the federal record, and it has never been corrected.

Who This Manual Is For

This manual is written for:

- **Chief Executive Officers** who bear ultimate liability for products manufactured under compromised certifications
- **Quality Managers** who rely on the accreditation system to validate their operations
- **Procurement Officers** who use AS9100/AI9100 and ISO 9001 certifications as supplier qualification criteria

- **Regulators** at the FAA, FDA, DHS, DOJ, and DOS who have oversight jurisdiction
- **Auditors and Registrars** who issue certifications under ANAB and MRA/MLA equivalent bodies
- **Defense Contractors** building aircraft, weapons systems, and vehicles for the U.S. military
- **Congressional Investigators** tasked with protecting national security and public safety

⚠ FRAUD ALERT

Every certification issued under ANAB and MRA/MLA equivalent bodies from 2018 to present is unreliable. This is not an opinion — it is documented on U.S. State Department Contract **19AQMM18R0131.** ANAB was falsely described as an "underwriter" for the IAF. No such role exists. No accreditation body has underwriting authority. This single misrepresentation contaminates every certificate issued under ANAB and every certificate issued under every international body bound by MRA/MLA equivalency to ANAB. The contamination is global. The contamination is ongoing.

Chapter 2: The Global Accreditation Framework — And How It Was Corrupted

The Accreditation Hierarchy

The global accreditation system is a tiered structure designed to create mutual confidence in certifications across national borders. Understanding this hierarchy is essential to understanding how a single fraud at one level can contaminate the entire system.

Level	Entity	Role
1 — Standards	ISO (International Organization for Standardization)	Publishes international standards (ISO 9001, ISO/IEC 17025, ISO 13485, etc.)
2 — Global Coordination (pre-2026)	IAF (International Accreditation Forum) / ILAC (International Laboratory Accreditation Cooperation)	Administered MLA/MRA agreements ensuring mutual recognition of accreditation across nations. Merged into **GLOBAC** on January 1, 2026.
2 — Global Coordination (post-2026)	GLOBAC (Global Accreditation Cooperation Incorporated)	Successor to IAF and ILAC. 159 members. Administers global mutual recognition agreements.
3 — Regional Bodies	EA (Europe), APAC (Asia-Pacific), IAAC (Inter-American), AFRAC (Africa), ARAC (Arab States)	Regional coordination and peer evaluation of national accreditation bodies
4 — National Accreditation Bodies	ANAB (USA), UKAS (UK), DAkkS (Germany), JAS-ANZ (Australia/NZ), CNAS (China), and others	Accredit certification bodies (registrars) and testing laboratories within their jurisdiction
5 — Registrars / Certification Bodies	BSI, Bureau Veritas, DNV, SGS, TÜV, NSF-ISR, NQA, Intertek, and others	Audit and certify companies to standards (AS9100, ISO 9001, ISO 13485, etc.)
6 — Certified Companies	Manufacturers, processors, laboratories, service providers	Hold certifications attesting to quality management system compliance

MRA and MLA: The Mechanisms of Equivalency

The **Multilateral Recognition Arrangement (MLA)** was administered by the IAF for management system certifications (ISO 9001, AS9100, ISO 13485, etc.). The **Mutual Recognition Arrangement (MRA)** was administered by ILAC for laboratory accreditations (ISO/IEC 17025) and inspection body accreditations (ISO/IEC 17020).

In plain language, these agreements work as follows: If ANAB accredits a registrar in the United States, and UKAS accredits a registrar in the United Kingdom, the MLA/MRA agreement declares that both accreditations are equivalent. A certificate issued under ANAB-accredited registrar is treated as identical in validity to a certificate issued under a UKAS-accredited registrar.

This is the critical mechanism of contamination. If ANAB's accreditation authority is fraudulent — if it was falsely described on a federal contract as possessing a role ("underwriter") that does not exist — then every certificate issued under ANAB is tainted. And because the MLA/MRA system treats all signatory bodies as equivalent, every certificate issued under every MLA/MRA partner body is also tainted. The fraud propagates across borders automatically.

ANSI's Takeover of ANAB — 2018

In 2018, the American National Standards Institute (ANSI) completed its acquisition of full ownership of the ANSI National Accreditation Board (ANAB). ANSI — the private-sector body that coordinates voluntary standards development in the United States — assumed complete control of the entity responsible for accrediting certification bodies and testing laboratories across all industries: aerospace, medical devices, food safety, environmental management, automotive, telecommunications, and defense.

This consolidation of standards development and accreditation oversight under a single private-sector entity created an unprecedented concentration of authority with no governmental checks.

The Federal Contract Fraud — Contract 19AQMM18R0131

On U.S. State Department Contract **19AQMM18R0131**, ANAB was described as an "underwriter" for the International Accreditation Forum. This description is false. The term "underwriter" implies financial guarantor status, risk assumption, and liability coverage for the IAF's global equivalency system. **No such role exists in any IAF governance document. No such role exists in any ILAC governance document. No accreditation body anywhere in the world has underwriting authority.** The claim was fabricated.

This misrepresentation on a federal contract is not a clerical error. It is a material misstatement that inflated ANAB's authority and influenced the U.S. government's reliance on the global accreditation system. Federal contracts are part of the permanent federal record. This evidence cannot be amended, retracted, or erased.

Xiao Jianhua and the Foreign Oversight Gap (2015–2021)

From 2015 to 2021, Xiao Jianhua served as Chairman of the International Accreditation Forum (IAF), which was incorporated in Delaware, USA. He was involved with international accreditation since 1994. Simultaneously, Xiao served as Chief Executive of the China National Accreditation Service (CNAS), headquartered in Beijing On January 12, 2017, Xiao Jianhua personally handed over a laboratory accreditation to the Wuhan BSL-4 lab but six months prior (approximately August 2016) scientists in the laboratory were complaining about not having enough highly trained technicians. They are critical to first line containment for the world's most dangerous pathogens. Six months later after issuing the laboratory certification, those concerns remained unaddressed. In a 2017 sworn deposition in Texas, Pamela Sale, Vice President of Laboratory Accreditation for ANSI–ANAB, confirmed that the lab certification system was fundamentally broken. Her words: ***"One of the issues is that there is no commonly agreed-upon set of standards that forensics labs around the country have to follow. Instead, there are informal***

guidelines that labs can choose to follow or not." If there were no enforced standards in U.S. labs, why would we expect rigorous oversight at foreign labs like Wuhan?

In 2017, the People's Republic of China enacted its **National Intelligence Law**. Article **7** of this law states: ***"All organizations and citizens shall, in accordance with the law, support, cooperate with, and collaborate in national intelligence work."*** This is a mandatory obligation — not optional, not voluntary. Every Chinese citizen and every Chinese organization is compelled by law to cooperate with China's state intelligence apparatus.

The implications are staggering. From 2017 to 2021, the Chairman of the IAF — the global body overseeing accreditation equivalency for all industries, including aerospace and defense — was legally obligated to cooperate with Chinese intelligence. This created a direct conduit into U.S. certification data, supplier information, aerospace manufacturing records, and defense supply chain intelligence. Every accreditation decision, every governance vote, every policy change during this period was made under this shadow. His role as chairman of the IAF positioned him perfectly to do so (**CYBERSECURITY**).

The January 1, 2026 Merger: GLOBAC

On January 1, 2026, the IAF and ILAC formally merged into a single entity: **Global Accreditation Cooperation Incorporated (GLOBAC)**. This new organization consolidated global accreditation under one umbrella with 159 member bodies from nations worldwide.

The merger was presented as a modernization — a streamlining of global accreditation governance. But the merger did NOT address:

- The **2018** federal contract misrepresentation on Contract **19AQMM18R0131**
- The **2015–2021** foreign oversight gap under Xiao Jianhua
- The structural contradictions in the accreditation chain
- The fact that **MRA/MLA** equivalency agreements carry forward the taint of every unresolved fraud

A new name does not erase FRAUD. A new corporate entity does not extinguish the legal consequences of false claims on federal contracts. GLOBAC inherited every unresolved liability of IAF and ILAC.

> ⚠ **WARNING**
>
> The merger of IAF and ILAC into GLOBAC in **January 2026** was executed without addressing or correcting the fraudulent "***underwriter***" claim on Contract **19AQMM18R0131.** The 2015–2021 foreign oversight gap under a chairman legally bound by China's National Intelligence Law was never investigated. Every certificate issued under the new GLOBAC umbrella inherits the taint of the old system. Rebranding is not remediation. Reorganization is not accountability.

Chapter 3: The Ore-to-Bolt Chain — Stage 1: Raw Material Extraction and Mining

Every aerospace component begins underground. The ore-to-bolt chain starts at the mine face, where raw materials are extracted from the earth. The principal materials in aerospace manufacturing include:

- **Iron ore** — the foundation of steel and stainless-steel alloys used in structural components, landing gear, and engine hardware
- **Bauxite** — the ore from which aluminum is refined, used in fuselage skins, wing structures, and interior components
- **Titanium ore (rutile and ilmenite)** — the source of titanium alloys critical to engine components, bulkheads, and high-strength airframe structures

- **Chromite** — the source of chromium used in stainless steel and nickel-based superalloys for corrosion and heat resistance
- **Nickel laterite and sulfide ores** — the source of nickel for superalloys (Inconel, Waspaloy, Hastelloy) used in turbine engines and exhaust systems

Material Composition Standards and Test Reports

Mining operations and primary processors must comply with material composition standards published by ASTM International and the Society of Automotive Engineers (SAE) Aerospace (ASTM & SAE are members of ANSI-ANAB) Material Specifications (AMS). Material Test Reports (MTRs) and Certificates of Conformance originate at this stage — these are the foundational documents that travel with every batch of material through the entire manufacturing chain.

An MTR certifies the chemical composition, mechanical properties, and physical characteristics of a material lot. It is the birth certificate of the metal. If this document is unreliable, every downstream process — smelting, forging, machining, heat treatment, assembly — is built on a lie.

Laboratory Accreditation at the Source

Testing laboratories that analyze ore composition, verify chemical percentages, and certify mechanical properties must be accredited to **ISO/IEC 17025: General Requirements for the Competence of Testing and Calibration Laboratories**. This accreditation is administered under the ILAC MRA — now inherited by GLOBAC.

The ILAC MRA was the mechanism that ensured a test result from a laboratory in Australia was considered equivalent to a test result from a laboratory in Germany or the United States. It depended entirely on the integrity of the accreditation bodies that accredited those laboratories.

When the accreditation body — ANAB — is operating under a **fraudulent** premise on a federal contract **19AQMM18R0131 (2018),** the accreditation it grants to testing laboratories is unreliable. And because the MRA treats all accreditation bodies as equivalent, the unreliability propagates to every laboratory accredited by every MRA signatory body worldwide.

⚠ FRAUD CONTAMINATION AT THE SOURCE

If the laboratory that tested your titanium alloy composition holds an accreditation traceable to ANAB or any MRA/MLA equivalent body, that test result is built on a **fraudulent** foundation. The ISO/IEC 17025 accreditation that vouches for that laboratory's competence flows through the same compromised system. The material in your aircraft may not be what the certificate says it is. The **FRAUD** begins underground — at the very first link in the chain.

Chapter 4: Stage 2: Primary Metal Processing — Smelting, Refining, and Alloying

Once raw ore is extracted, it must be transformed into usable metal through smelting, refining, and alloying. This is the stage where ore becomes aerospace-grade material — where the chemical composition is controlled to precise specifications and where heat numbers and lot traceability are established.

Aerospace Alloys and Their Critical Specifications

Alloy	Designation	Primary Use	Governing Specification
Aluminum 2024-T3	Al-Cu alloy	Fuselage skins, wing structures, structural fittings	AMS 4037, ASTM B209
Aluminum 7075-T6	Al-Zn-Mg-Cu alloy	High-strength structural components, wing spars	AMS 4045, ASTM B209

Alloy	Designation	Primary Use	Governing Specification
Titanium Ti-6Al-4V	Grade 5 Ti alloy	Engine components, bulkheads, landing gear, fasteners	AMS 4911, AMS 4928, ASTM B265
Inconel 718	Ni-Cr-Fe superalloy	Turbine disks, combustion chambers, exhaust components	AMS 5662, AMS 5663
Stainless Steel 17-4 PH	Precipitation-hardened SS	Fasteners, fittings, valve components	AMS 5604, ASTM A564
Waspaloy	Ni-based superalloy	Turbine blades, gas turbine components	AMS 5544, AMS 5708

Smelting, Refining, and Alloy Production

Smelting reduces metal ores to their base metals using extreme heat and chemical reduction. Refining removes impurities to achieve the chemical purity required by aerospace specifications. Alloying introduces precise quantities of additional elements — copper, zinc, magnesium, vanadium, chromium, nickel — to achieve the mechanical properties specified by AMS and ASTM standards.

For titanium production, the Kroll process remains the dominant method: titanium tetrachloride is reduced with magnesium under inert atmosphere to produce titanium sponge, which is then melted in a vacuum arc remelt (VAR) furnace and alloyed to specification. Each VAR heat is assigned a unique heat number — the lot identity that follows the material through the entire supply chain.

Quality System Requirements at Processing Facilities

Refineries, smelters, and alloy producers serving the aerospace industry must hold quality management system certification to **ISO 9001** at minimum, and preferably **AS9100** (now as of January 2026-transitioning to **AI9100**) for aerospace-designated production. These certifications are accredited by ANAB or by national accreditation bodies bound to ANAB

through MRA/MLA equivalency agreements — the same compromised framework documented in **Chapter 2.**

Counterfeit Materials in the Supply Chain

The threat of counterfeit and substandard materials entering aerospace supply chains is not hypothetical. Documented cases include substandard titanium from suppliers in China entering U.S. aerospace production — material that did not meet the chemical composition or mechanical property requirements of its claimed specification, accompanied by falsified material test reports. When the accreditation of the testing laboratory that should have caught these discrepancies is itself fraudulent, the counterfeit material passes undetected.

⚠ COUNTERFEIT MATERIAL ALERT

Without trustworthy accreditation of testing labs and material processors, counterfeit and substandard alloys enter the supply chain undetected. The laboratory that should have caught the wrong alloy composition holds an ISO/IEC 17025 accreditation issued under the compromised MRA/MLA framework. The refinery that should have maintained chemical controls holds an ISO 9001 certification accredited by a body tied to ANAB. When the accreditation body itself is **fraudulent**, no certificate of conformance can be trusted. The alloy in your aircraft engine may not be what the paperwork claims.

Chapter 5: Stage 3: Mill Processing — Rolling, Forging, and Forming

Once alloys are produced, they must be processed into usable mill forms — plate, sheet, bar, billet, wire, extrusion, and forging stock. This stage transforms bulk metal into the shapes and dimensions required by component manufacturers.

Mill Processes

- **Hot Rolling:** Metal is passed through rollers at temperatures above the recrystallization point, reducing thickness and producing plate, sheet, and strip products. Hot rolling establishes the grain structure critical to mechanical properties.
- **Cold Rolling:** Further reduction at ambient temperature to achieve tighter dimensional tolerances, improved surface finish, and work-hardened properties.
- **Open-Die Forging:** Metal is compressed between flat or shaped dies without full enclosure. Used for large components — bulkheads, landing gear beams, structural forgings — where grain flow must follow the part geometry.
- **Closed-Die Forging (Impression Die):** Metal is shaped in a fully enclosed die cavity to near-net shape. Used for high-volume components where dimensional precision and grain flow optimization are critical.
- **Extrusion:** Metal is forced through a shaped die to produce constant cross-section profiles — structural members, stringers, longerons.

Mill Test Reports and Certifications

Every mill product is accompanied by a Mill Test Report (MTR) certifying chemical composition, mechanical properties (tensile strength, yield strength, elongation, hardness), heat treatment condition, dimensional compliance, and traceability to the original heat number. These MTRs must comply with AMS, ASTM, and customer-specific specifications.

Mills serving the aerospace industry must maintain quality management systems certified to **AS9100/AI9100.** Special processes performed at the mill — heat treatment, surface treatment, nondestructive testing — require **NADCAP accreditation**.

Boeing's 2002 NADCAP Mandates

In **April 2002,** Boeing collaborated with the Performance Review Institute (PRI) to expand the **National Aerospace and Defense Contractors Accreditation Program** (NADCAP) for special processes including heat treatment, welding, and nondestructive testing. Boeing issued a supplier bulletin stating that suppliers without NADCAP accreditation would be "removed from the list of approved processors."

The mandate was absolute. Suppliers had no choice — either achieve and maintain NADCAP accreditation at significant cost (audit fees, corrective actions, surveillance audits, process documentation upgrades) or lose Boeing as a customer.

Yet Boeing itself never held NADCAP accreditation. The company that demanded every supplier meet NADCAP requirements exempted itself from the same standard. Boeing's own special processes — heat treatment of structural components, NDT of fuselage assemblies, welding of critical joints — were never subjected to NADCAP scrutiny.

⚠ BOEING'S DOUBLE STANDARD

In **2002**, Boeing mandated NADCAP accreditation for all suppliers' special processes while Boeing itself never held NADCAP accreditation. Boeing's supplier bulletin stated: "***By not obtaining accreditation your company will be removed from the list of approved processors***." Suppliers paid tens of thousands of dollars in audit fees and corrective actions. Boeing paid nothing. Boeing was exempt from its own rule. This hypocrisy persisted for over two decades.

Chapter 6: Stage 4: Component Manufacturing — Machining, Casting, and Fabrication

Manufacturing Processes

Aerospace component manufacturing encompasses multiple precision processes:

- **CNC Machining:** Computer Numerical Control milling, turning, and drilling of metal stock into finished components. Tolerances measured in thousandths of an inch. Five-axis machining centers produce complex geometries for structural fittings, brackets, actuator housings, and engine components.
- **Investment Casting:** The lost-wax process for producing near-net-shape components — turbine blades, vanes, structural castings — with complex internal geometries impossible to achieve through machining alone.
- **Precision Forging:** Isothermal and hot-die forging of titanium and nickel alloys for engine disks, compressor blades, and structural components requiring optimized grain flow.
- **Sheet Metal Fabrication:** Forming, stretch forming, hydropress forming, and brake forming of aluminum and titanium sheet for skins, panels, ribs, and frames.

First Article Inspection (FAI)

First Article Inspection, governed by **AS9102**, requires a complete, independent, and documented inspection of the first production unit (or a representative sample) of a new part. FAI verifies that all engineering design and specification requirements are correctly understood, accounted for, and achieved in the manufacturing process. It covers dimensional verification, material verification, special process verification, and functional testing.

FAI is the gatekeeper between design intent and production reality. If the quality management system under which FAI is performed is certified by a **fraudulently** accredited registrar, the integrity of the FAI is compromised.

AS9100/AI9100: The Aerospace Quality Management System Standard

AS9100 now **AI9100** is the international Quality Management System standard for the aviation, space, and defense industries. It is built on the foundation of ISO 9001 and adds aerospace-specific requirements including:

- Risk management across the product lifecycle
- Configuration management for design-controlled products
- Product safety awareness and processes
- Counterfeit parts prevention programs
- Supply chain control and flow-down of requirements
- Special process management
- On-time delivery performance monitoring
- Human factors in manufacturing

AS9100 certification is mandatory for aerospace component manufacturers. The certification is accredited by ANAB or MRA/MLA equivalent bodies — all of which have been **fraudulent** since 2018.

The 2026 Transition: AS9100 to AI9100

In 2026, the International Aerospace Quality Group (IAQG) initiated the rebranding of AS9100 to **AI9100** — International Aerospace 9100. The "IA" replaces "AS" (Aerospace Standard) to reflect the global scope of the standard. Publication is expected late **2026 to mid-2027**. The new designation encompasses the full 91xx series: AI9100 , AI9110, AI9120.

This rebranding does not change the technical requirements of the standard in any material way related to accreditation governance. ***It does not fix the underlying accreditation*** **FRAUD**. It does not address the fact that every AS9100 certificate issued from 2018 to present was accredited under a compromised system.

The IAQG OASIS Database

The **OASIS (Online Aerospace Supplier Information System)** database is the central registry of AS9100/AI9100 certified organizations maintained by the IAQG. OASIS contains certification status, scope, registrar identity, accreditation body, audit history, and nonconformance data for every certified aerospace supplier worldwide.

Boeing and other prime contractors used OASIS as their primary tool for supplier qualification — verifying a supplier's AS9100 certification status with a ***keystroke rather than conducting physical on-site audits***. This digital verification model eliminated the firsthand knowledge that comes from walking a supplier's production floor, observing their processes, and interviewing their personnel. **Boeing replaced human judgment with a database query** — a database populated by certifications issued under a compromised accreditation system.

⚠ THE NAME CHANGE DECEPTION

AS9100 became AI9100 in 2026. GLOBAC replaced IAF/ILAC. New names, same **fraudulent** foundation. No accreditation body has addressed or corrected the "***underwriter***" fraud on Contract **19AQMM18R0131.** No registrar has disclosed the Xiao Jianhua oversight gap to its certified clients. **Rebranding** is not **remediation.** A new label on a compromised system does not make the system trustworthy — it makes the deception harder to detect.

Chapter 7: Stage 5: Special Processes — Heat Treatment, Surface Treatment, and NDT

Special processes are manufacturing operations whose results cannot be fully verified by subsequent inspection and testing of the product alone. The quality of the outcome depends entirely on the control of process parameters during execution. If a heat treatment is performed incorrectly, the part may appear normal visually and dimensionally but possess degraded metallurgical properties — reduced fatigue life, improper hardness, residual stress concentrations — that will cause catastrophic failure in service.

Heat Treatment

Heat treatment is the controlled heating and cooling of metals to alter their microstructure and mechanical properties. Aerospace heat treatment processes include:

- **Solution Heat Treating:** Heating the alloy to a temperature where alloying elements dissolve into a solid solution, followed by rapid quenching to lock them in place. Critical for aluminum (2024, 7075) and titanium (Ti-6Al-4V) alloys.
- **Aging (Precipitation Hardening):** Controlled reheating after solution treatment to precipitate strengthening phases within the alloy matrix. T6 temper in aluminum, STA (Solution Treated and Aged) in titanium and nickel alloys.
- **Annealing:** Heating to soften material, relieve work hardening, and improve formability. Critical between forming operations.
- **Stress Relief:** Low-temperature heating to reduce residual stresses from machining, welding, or forming without significantly altering mechanical properties.

Every heat treatment cycle must be documented with time-temperature recorder charts, furnace survey data (per AMS 2750 — Pyrometry), load thermocouple data, and quench parameters. Furnaces must be surveyed and calibrated on schedule. A single deviation — wrong

temperature, wrong soak time, wrong quench delay — can render an entire load of parts metallurgically defective.

Surface Treatment

- **Anodizing:** Electrochemical conversion of the aluminum surface to aluminum oxide for corrosion resistance and paint adhesion. Type II (chromic acid or sulfuric acid) and Type III (hard anodize) per MIL-A-8625.
- **Cadmium Plating:** Electrodeposition of cadmium for corrosion protection of steel components, particularly fasteners. Per QQ-P-416.
- **Chromate Conversion Coating:** Chemical conversion coating on aluminum for corrosion resistance. Per MIL-DTL-5541.
- **Shot Peening:** Bombarding the surface with small spherical media to induce compressive residual stress, improving fatigue life. Per AMS 2430, SAE J443.

Non-Destructive Testing (NDT)

- **Ultrasonic Testing (UT):** High-frequency sound waves detect internal discontinuities — voids, inclusions, cracks, delamination's. Critical for forgings, castings, and composite structures.
- **Radiographic Testing (RT):** X-ray or gamma-ray imaging reveals internal defects in castings, weldments, and assemblies.
- **Magnetic Particle Testing (MT):** Detects surface and near-surface cracks in ferromagnetic materials using magnetic fields and iron particles.
- **Liquid Penetrant Testing (PT):** Detects surface-breaking cracks and porosity in non-porous materials using fluorescent or visible dye penetrants.
- **Eddy Current Testing (ET):** Electromagnetic induction detects surface and near-surface cracks, conductivity variations, and coating thickness in conductive materials.

Welding

- **Electron Beam Welding (EBW):** High-energy-density welding in vacuum for deep-penetration, narrow-HAZ joints in titanium and nickel alloys.
- **TIG/GTAW Welding:** Gas Tungsten Arc Welding for precision joints in stainless steel, titanium, and aluminum.
- **Friction Stir Welding (FSW):** Solid-state joining process for aluminum alloys, producing defect-free welds without melting.

NADCAP: The Special Process Accreditation Program

The **National Aerospace and Defense Contractors Accreditation Program (NADCAP)** is administered by the **Performance Review Institute (PRI)**. NADCAP is a cooperative industry program in which prime contractors — Boeing, Airbus, Lockheed Martin, Raytheon, Northrop Grumman, GE Aerospace, Pratt & Whitney, Rolls-Royce, and others — collectively define special process requirements and authorize audits of suppliers.

NADCAP accreditation covers: heat treating, chemical processing (including surface treatments), nondestructive testing, welding, materials testing laboratories, coatings, composites, electronics, and sealants. It is mandatory for aerospace special process suppliers.

NADCAP operates within the broader AS9100/AI9100 ecosystem. Suppliers seeking NADCAP accreditation must first hold AS9100 certification, which is accredited by ANAB or MRA/MLA equivalent bodies. This means NADCAP itself — the program specifically designed to ensure the integrity of the most critical manufacturing processes in aerospace — is built on a **fraudulent** accreditation foundation.

⚠ SPECIAL PROCESS CRISIS

Heat treatment, NDT, and surface treatment are the processes that determine whether an aircraft part will survive or fail in flight. NADCAP certifies these processes — but NADCAP operates under the same compromised accreditation umbrella as AS9100. If a heat-treat furnace was qualified under a **fraudulently** accredited system, every part processed in that furnace is suspect. If an NDT technician's qualifications were validated under a **fraudulently** accredited quality system, every inspection that technician performed is suspect. The processes that keep aircraft in the sky are certified by a system built on **FRAUD**.

Chapter 8: Stage 6: Fastener Manufacturing — The Bolt

The aerospace fastener is the final product in the ore-to-bolt chain — and arguably the most critical. A single aircraft contains hundreds of thousands of fasteners: bolts, nuts, rivets, pins, screws, collars, inserts. Every one of them is a structural element. Everyone must perform under extreme loads, temperatures, vibrations, and corrosive environments for decades of service.

Fastener Manufacturing Processes

- **Heading:** Cold heading or hot heading forms the bolt head from wire or bar stock. The head geometry — hex, 12-point, countersunk, protruding — is established in this operation.
- **Threading:** Thread rolling (preferred for fatigue-critical applications) or thread cutting produces the fastener threads. Rolled threads compress the grain structure, improving fatigue life. Cut threads interrupt the grain flow and are generally inferior for aerospace applications.

- **Heat Treatment:** Solution treatment and aging to achieve the required hardness and strength per specification. Fastener heat treatment must comply with AMS 2759 (steel) or the applicable alloy specification.
- **Surface Treatment:** Cadmium plating, aluminum IVD coating, dry film lubricant, passivation — all per applicable specifications for corrosion protection and installation torque control.
- **Testing:** Tensile testing, proof load testing, hardness testing, hydrogen embrittlement testing (for plated fasteners), and dimensional inspection per ASTM F606, ASTM F568, and the applicable NAS, MS, or AN standard.

Fastener Specifications

Specification Series	Issuing Body	Application
NAS (National Aerospace Standards)	Aerospace Industries Association (AIA)	High-strength structural bolts, pins, and rivets
MS (Military Standards)	U.S. Department of Defense	Military and defense aerospace fasteners
AN (Air Force-Navy Aeronautical Standards)	U.S. DoD (legacy)	General-purpose aerospace fasteners
ASTM F606	ASTM International	Test methods for fastener mechanical properties
ASTM F568	ASTM International	Metric fastener mechanical property specifications

Quality Requirements for Fastener Manufacturers

Aerospace fastener manufacturers must hold **AS9100/AI9100** certification. If the fastener manufacturer performs heat treatment, surface treatment, or NDT in-house, those processes require **NADCAP** accreditation. Both AS9100/AI9100 and NADCAP are accredited under a **fraudulent** ANAB/MRA/MLA framework.

Consequences of Counterfeit Fasteners

A counterfeit or substandard fastener can cause: structural failure under load, fatigue cracking from inadequate material properties, hydrogen embrittlement from improper plating processes, corrosion from inadequate surface treatment, and catastrophic decompression from failed pressure boundary joints. The Alaska Airlines Flight 1282 door plug incident on January 5, 2024, demonstrated in terrifying clarity what happens when fastener and assembly quality fails — four bolts missing from a door plug resulted in a fuselage blowout at 16,000 feet.

> **⚠ THE FINAL LINK IN THE CHAIN**
>
> A single counterfeit bolt can bring down an aircraft. When the entire accreditation chain — from the lab that tested the bolt's raw material composition, to the heat treater that hardened it, to the surface treatment facility that plated it, to the manufacturer that assembled and tested it — operates under fraudulent accreditation, no bolt can be trusted. The Alaska Airlines Flight 1282 door plug blowout demonstrated the catastrophic consequences of quality failures. Four missing bolts. Sixteen thousand feet. One hundred seventy-one passengers and six crew. The ore-to-bolt chain failed at the bolt.

Chapter 9: The FAA — Federal Aviation Administration

What the FAA Is

The **Federal Aviation Administration (FAA)** is the United States federal agency within the Department of Transportation (DOT) responsible for regulating all aspects of civil aviation in the United States. Its responsibilities include:

- Aircraft design certification (Type Certificates)

- Manufacturer authorization (Production Certificates)
- Individual aircraft airworthiness certification
- Pilot and mechanic licensing
- Air traffic control
- Airport safety and standards
- Regulation of commercial space transportation

Statutory Authority

The FAA derives its authority from the **Federal Aviation Act of 1958**, recodified as **49 U.S.C. Chapter 447**, and subsequent amendments including the **Aircraft Certification, Safety, and Accountability Act of 2020**, which was enacted in response to the 737 MAX crashes.

Type Certificates, Production Certificates, and Airworthiness Certificates

Type Certificate (TC): The FAA issues a Type Certificate to approve an aircraft design — confirming that the aircraft type (e.g., Boeing 737 MAX, Boeing 787) complies with applicable airworthiness standards (14 CFR Part 25 for transport category aircraft). The **TC** represents **FAA approval of the design**, **not the manufacturing process.**

Production Certificate (PC): The FAA issues a Production Certificate to authorize a manufacturer to produce aircraft (or aircraft components) conforming to an approved type design. The PC establishes that the manufacturer has a quality system capable of producing conforming products. However, the FAA's production certificate evaluation is not an AS9100 audit — it is a regulatory assessment under 14 CFR Part 21, Subpart G.

Airworthiness Certificate: Each individual aircraft receives an Airworthiness Certificate (Standard or Special) confirming it conforms to its approved type design and is in a condition for safe operation. This certificate is issued for the specific aircraft — by serial number — not for the manufacturing facility.

The Critical Distinction: FAA Airworthiness vs. AS9100

FAA airworthiness is NOT the same as AS9100 certification. These are two entirely separate systems:

Attribute	FAA Airworthiness / Production Certificate	AS9100/AI9100 Certification
Issuing Authority	Federal Aviation Administration (U.S. Government)	Third-party registrar accredited by ANAB or equivalent
Legal Basis	49 U.S.C. Chapter 447, 14 CFR Part 21	Voluntary international standard (SAE/IAQG)
What It Certifies	Aircraft design conformity and condition for safe operation	Manufacturing organization's quality management system
Scope	Specific aircraft type and individual aircraft	Manufacturing facility's QMS processes
Boeing Status	Held continuously	Never held until 2024 announcement (not yet achieved)

A common industry misconception — perpetuated for decades — is that **FAA** airworthiness validates AS9100 compliance. **It does not.** The FAA certifies the design and the individual aircraft. AS9100 certifies the manufacturer's quality management system. Boeing held FAA production certificates while **never holding AS9100** certification for 24 years. The existence of one does not validate the absence of the other.

ODA: Organization Designation Authorization

The FAA delegates inspection and certification authority to manufacturers through the **Organization Designation Authorization (ODA)** program. Under ODA, Boeing inspects its own aircraft. Boeing's own employees — designated as ODA Unit Members — perform the inspections that the FAA would otherwise conduct. This self-inspection model, combined with the absence of AS9100 certification, created a dangerous oversight vacuum: Boeing was

simultaneously its own inspector, its own quality system authority, and exempt from the industry standard it forced on every supplier.

FAA airworthiness certificates cannot retroactively validate products manufactured in a **fraudulently** accredited environment. An airworthiness certificate issued for a Boeing 787 does not validate that the hundreds of AS9100-certified suppliers who built its components were operating under legitimate accreditation.

> **⚠ FAA AIRWORTHINESS ≠ AS9100 COMPLIANCE**
>
> The long-standing industry belief that FAA airworthiness equates to AS9100 certification is a dangerous misconception. FAA certifies the aircraft; AS9100 certifies the manufacturing system. Boeing held FAA production certificates while never holding AS9100 certification for 24 years. The FAA's ODA program allowed Boeing to inspect itself. No independent third-party audit of Boeing's quality management system was ever conducted under AS9100 during that period. **The FAA cannot retroactively validate manufacturing environments built on fraudulent accreditation.**

Chapter 10: The FDA — Food and Drug Administration

What the FDA Is

The **Food and Drug Administration (FDA)** is the United States federal agency within the Department of Health and Human Services (**HHS**) responsible for protecting public health by regulating:

- Food (except meat, poultry, and some egg products regulated by USDA)
- Prescription and over-the-counter drugs

- Biological products (vaccines, blood components, gene therapy)
- Medical devices (from tongue depressors to artificial hearts)
- Cosmetics
- Tobacco products
- Electronic products that emit radiation

Statutory Authority

The FDA derives its authority from the **Federal Food, Drug, and Cosmetic Act (FD&C Act, 21 U.S.C. Chapter 9)**, originally enacted in 1938, and subsequent amendments including the **FDA Safety and Innovation Act of 2012 (FDASIA)**, the **Medical Device Amendments of 1976**, and the **Food Safety Modernization Act of 2011 (FSMA)**.

Medical Device Regulation

The FDA classifies medical devices into three classes based on risk:

Class	Risk Level	Regulatory Pathway	Examples
Class I	Low	General controls; most exempt from premarket submission	Bandages, tongue depressors, examination gloves
Class II	Moderate	510(k) Premarket Notification — demonstrate substantial equivalence to a predicate device	Powered wheelchairs, infusion pumps, surgical drapes
Class III	High	Premarket Approval (PMA) — clinical evidence of safety and effectiveness required	Heart valves, implantable defibrillators, cochlear implants

All medical device manufacturers must comply with the **Quality System Regulation (QSR) under 21 CFR Part 820**, which establishes current Good Manufacturing Practice (cGMP)

requirements for the design, manufacture, packaging, labeling, storage, installation, and servicing of medical devices.

ISO 13485: The Medical Device QMS Standard

ISO 13485: Medical devices — Quality management systems — Requirements for regulatory purposes is the international QMS standard used by medical device manufacturers worldwide. It is harmonized with, but distinct from, ISO 9001 and contains specific requirements for risk management (per ISO 14971), design controls, traceability, sterile manufacturing, and regulatory compliance.

ISO 13485 certifications are accredited by ANAB and MRA/MLA equivalent bodies — **the same compromised framework as AS9100**. If the accreditation body is **fraudulent**, then ISO 13485 certifications are unreliable. This means medical devices — surgical instruments, orthopedic implants, cardiac devices, diagnostic imaging equipment, ventilators, infusion pumps, life support systems — may have been manufactured under **fraudulently** accredited quality systems. The FDA sits on ANSI-ANAB's board not just as a member but a paying customer.

Food Safety: FSMA, ISO 22000, and FSSC 22000

The **Food Safety Modernization Act (FSMA)**, signed into law in 2011, shifted FDA's approach from reacting to foodborne illness outbreaks to preventing them. FSMA mandates preventive controls, supply chain verification, and hazard analysis for food facilities.

ISO 22000 (Food safety management systems) and **FSSC 22000** (Foundation FSSC 22000, which adds prerequisite programs to ISO 22000) are international food safety management standards. FSSC 22000 is recognized by the Global Food Safety Initiative (GFSI). Both standards' certifications are accredited under the same ANAB/MRA/MLA framework — the same **fraudulent system**.

⚠ MEDICAL DEVICE AND FOOD SAFETY CRISIS

The ANAB **FRAUD** is not limited to aerospace. ISO 13485 (medical devices) and ISO 22000/FSSC 22000 (food safety) certifications are accredited by the same **fraudulent** bodies. Your surgical implant was manufactured under a quality system certified by a registrar accredited by ANAB or its MRA/MLA equivalent. Your child's ventilator was built under the same system. Your food packaging, your pharmaceutical supply chain, your diagnostic equipment — all certified under a system built on a **fraudulent** federal contract. The accreditation **FRAUD** is cross-industry. No sector is immune.

Chapter 11: DHS, DOJ, and DOS — Federal Enforcement and Oversight Roles

Department of Homeland Security (DHS)

The **Department of Homeland Security** is the federal department responsible for protecting the United States from threats — including threats to critical infrastructure. DHS's mandate encompasses: DHS is not just a member on the ANSI-ANAB board but also a **paying customer**.

- **Critical Infrastructure Protection:** DHS identifies and protects 16 critical infrastructure sectors, including the Transportation Systems Sector and the Defense Industrial Base Sector — both directly affected by **fraudulent** accreditation in aerospace and defense manufacturing.

- **Supply Chain Security:** DHS has direct jurisdiction over supply chain integrity for aerospace and defense. Counterfeit parts, substandard materials, and **fraudulent** certifications entering the defense supply chain are DHS concerns.
- **Transportation Security Administration (TSA):** Within DHS, the TSA is responsible for aviation security — the safety of passengers and crew. When the manufacturing quality of the aircraft itself is compromised by **fraudulent** accreditation, TSA's mission is undermined at the most fundamental level.

DHS subcommittee testimony has exposed Boeing's lack of on-site supplier auditing for over 24 years — a period during which Boeing relied on OASIS database queries and AS9100 certifications issued under the compromised ANAB framework rather than sending auditors to walk supplier production floors.

Department of Justice (DOJ)

The **Department of Justice** is the federal department responsible for enforcing federal law, including the prosecution of **fraud**. DOJ is not just a member on the ANSI-ANAB board but also a **paying customer**. DOJ's relevant authorities include:

- **False Claims Act (31 U.S.C. § 3729–3733):** The False Claims Act imposes liability on any person or entity that knowingly submits a false claim to the federal government or causes a false claim to be submitted. The **fraudulent** "***underwriter***" description of ANAB on Contract **19AQMM18R0131** constitutes a potential violation of the False Claims Act — a false statement on a federal contract that influenced government reliance on the accreditation system.
- **Federal Contract Fraud:** **Fraudulent** misrepresentation on a federal contract is a criminal offense under 18 U.S.C. § 1001 (**false statements**) and 18 U.S.C. § 1031 (major **fraud** against the United States).
- **Antitrust Division:** DOJ's Antitrust Division has authority to investigate anti-competitive practices in the accreditation ecosystem — including the concentration of standards

development and accreditation oversight under a single entity (ANSI/ANAB) and the potential for market exclusion of competing accreditation models.

In 2024, Boeing entered a guilty plea to federal fraud charges related to the 737 MAX — an admission that Boeing defrauded the FAA in the certification of the MCAS flight control system. This guilty plea established Boeing's willingness to engage in **FRAUD** against federal regulators. It is a matter of federal record.

Department of State (DOS)

The **Department of State** is the federal department that issued **Contract 19AQMM18R0131** — the contract on which ANAB was **falsely** described as an "***underwriter***" for the IAF. The State Department is the contracting authority. The State Department holds the contract in its records. Federal contracts are part of the permanent federal record — ***they cannot be amended, retracted, or destroyed.***

- **ITAR (International Traffic in Arms Regulations):** DOS administers ITAR through the Directorate of Defense Trade Controls (DDTC). ITAR controls the export and import of defense-related articles and services. When the accreditation system governing the quality management of ITAR-controlled manufacturing is **fraudulent,** the integrity of defense exports is compromised. **fraudulent** accreditation means that manufacturers of ITAR-controlled items may be operating under **fraudulently** validated quality systems.

⚠ FEDERAL AGENCIES MUST ACT

DHS, DOJ, and DOS all have jurisdiction over different aspects of this **FRAUD** DHS oversees critical infrastructure — including the aerospace and defense supply chain. DOJ prosecutes federal contract **FRAUD** under the False Claims Act and 18 U.S.C. § 1001. DOS holds Contract **19AQMM18R0131** — the federal contract on which the **fraudulent** "***underwriter***" claim was made. The evidence is in the federal record. **It is permanent.** It is documented. The question is not whether **FRAUD** occurred — it is why no agency has acted.

Chapter 12: Boeing — The 24-Year Uncertified Manufacturer

Chronological Record

Date	Event
September 19, 2001	Boeing announces layoffs of 20,000–30,000 employees following the September 11 attacks. The largest single workforce reduction in Boeing's history.
April 2002	Boeing collaborates with the Performance Review Institute (PRI) to expand NADCAP for special processes — heat treatment, welding, NDT. Boeing issues supplier bulletin mandating NADCAP accreditation for all special process suppliers. Non-compliant suppliers face removal from Boeing's approved processor list.
July 2002	Boeing issues supplier bulletin mandating AS9100 compliance, accredited by ANAB. Bulletin states: "Our preference is to deal with proven suppliers... and not have to do on-site quality system surveys." Boeing eliminates physical supplier audits in favor of database verification. Boeing itself does not hold AS9100 certification.
October 2003	**Head UP 22** Bulletin by ANSI-ANAB suppliers who are AS9100 certified are required to join the OASIS Online System Information System run by the IAQG international Aerospace Quality Group run 65% at the time by Boeing. Supplier could not refuse OASIS membership or fees if they did, they would get their certificate taken away/
2002–2024	Boeing builds over 12,000 commercial aircraft and over 400 military aircraft without AS9100 certification. Aircraft produced include: 737NG, 737 MAX, 747-8, 767, 777, 777X, 787 Dreamliner, P-8 Poseidon, KC-46 Pegasus, F/A-18E/F Super Hornet, F-15EX Eagle II, AH-64 Apache, CH-47 Chinook, V-22 Osprey, T-7A Red Hawk, and Air Force One (VC-25B).
October 29, 2018	Lion Air Flight 610 crashes into the Java Sea. 189 people killed. Boeing 737 MAX 8.
March 10, 2019	Ethiopian Airlines Flight 302 crashes near Bishoftu. 157 people killed. Boeing 737 MAX 8.

Date	Event
January 5, 2024	Alaska Airlines Flight 1282 — a Boeing 737 MAX 9 — suffers mid-flight fuselage blowout when a door plug separates from the aircraft at 16,000 feet. Four bolts were missing from the door plug. 171 passengers and 6 crew on board. No fatalities by extraordinary luck.
July 2024	Boeing announces it will seek AS9100 certification for the first time in its history — 24 years after mandating it for every supplier.
June 27,2024	Reuters Interview Elizabeth Lund VP Quality Boeing state Boeing was ***willing and prepared*** to get AS9100, ***compliant*** to the standard & performing ***internation audits*** as if Boeing was certified to the standard
October 2024	40 Year QA Expert & Boeing Shareholder Daryl Guberman who stood up in April 17,2024 under penalty of getting ejected or arrested stood up at the DHS Subcommittee in Washington D.C. with the 2 Boeing supplier bulletins from April-July 2002. Illustrating Boeing giving up onsite supplier auditing for 22 years only if need be or need arises would they visit suppliers. June 18th Guberman went to the DHS Subcommittee in Washington D.C.to see David Calhoun get questioned concerning the Alaska 1282 door plug issue, A audience member holding a picture of their daughter who died on either the Ethiopian or Indonesian air crashes. They were screaming "***You killed my daughter you killed my family***" October 2024 for almost a month Guberman went out to Washington state Everrett, Auburn, Northfield, Renton questioning employees -No one knew of AS9100, or internal auditing. Some said that if you took a completed job packet after aircraft delivery out of archives there would be paperwork missing. Some of the employees told Guberman, if they were asked to attend a safety meeting their supervisors many time would say no, because the plane had to make it to the next station **Daryl Guberman-Hypothesis on Certification Feasibility** High-quantity environments face challenges integrating the resource demands of **AS9100/AI9100**, particularly internal auditing and management review. This is a larger reason why from July 2002 to present Boeing never went after AS9100.
2026	AS9100 transitions to AI9100. Boeing still does not hold the certification as of this publication.

The Hypocrisy

Boeing mandated AS9100 certification for every supplier in its supply chain beginning in **2002.** Suppliers — small machine shops, heat treaters, surface treatment facilities, fastener manufacturers, material processors — were required to pay for certification audits, corrective actions, surveillance audits, NADCAP accreditation, and OASIS database registration. These costs ran into tens of thousands of dollars per year for small businesses. Failure to comply meant removal from Boeing's approved supplier list — loss of their largest customer.

Boeing imposed this requirement while exempting itself from the same standard for 24 years. Boeing's own manufacturing facilities — Renton (737), Everett (747, 767, 777, 787), North Charleston (787), St. Louis (defense), Mesa (Apache), Philadelphia (Chinook, V-22) — operated **without AS9100 certification.** No third-party registrar audited Boeing's quality management system under AS9100. No OASIS database entry existed for Boeing's manufacturing facilities. Boeing demanded compliance from others while refusing to comply itself.

⚠ 24 YEARS WITHOUT CERTIFICATION

Boeing built aircraft for **24 years** without the AS9100 certification it forced on every supplier. Ethiopian Airlines Flight 302 — **157** dead. Lion Air Flight 610 — **189** dead. Alaska Airlines Flight 1282 — near-catastrophe at 16,000 feet. Air Force One. F/A-18 Super Hornets. Apache helicopters. KC-46 tankers. All built in an **uncertified** manufacturing environment. Boeing's **July 2002 supplier bulletin** eliminated on-site audits. Boeing inspected itself under the FAA's ODA program. No independent AS9100 audit. No third-party oversight. **No** FAA airworthiness certificate can retroactively validate 24 years of uncertified manufacturing.

Chapter 13: Registrars — The First Line of Defense That Failed

What Registrars Are

Registrars — also called certification bodies (**CBs**) — are third-party organizations accredited by ANAB or equivalent national accreditation bodies to audit and certify companies to management system standards. Major registrars operating in the aerospace, medical device, and general manufacturing sectors include BSI Group, Bureau Veritas, DNV, SGS, TÜV (various entities), NSF-ISR, NQA, Intertek, SAI Global (now part of Arina), and others. (NSF, NQA, BSI, INTERTEK, TUV-RHINELAND, TUV-SUD, DQS, -all sit as members on ANSI-ANAB board) BSI Group was not just a member on ANSI-ANAB board but also a member on ANSI-ANAB Management Systems Accreditation Committee (MSAC) that can ***grant, suspend, and withdraw certification.*** Boeing sat on the MSAC board from **2014-2024** even though they weren't AS9100. In 2018 after ANSI-ANAB perpetrated the **FRAUD** on Federal Contract 19**AQMM18R0131** Boeing still required them on their supplier portal to maintain ANAB accreditation without knowing about the **FRAUD** they passed onto their suppliers.

Registrars are the gatekeepers of the certification system. They conduct initial certification audits, annual surveillance audits, and triennial recertification audits. They review documentation, observe processes, interview personnel, examine records, and issue certificates attesting that the audited organization's quality management system conforms to the applicable standard (AS9100, ISO 9001, ISO 13485, etc.).

Registrars are supposed to be the first line of defense — the independent third parties who stand between the manufacturing world and the public, verifying that quality systems function as claimed. **They failed**.

What Registrars Failed to Disclose

Between **2018** and the present, no registrar disclosed the following material facts to its certified clients:

- **ANAB's false "underwriter" claim** on U.S. State Department Contract **19AQMM18R0131** — a **fraudulent** misrepresentation of ANAB's authority that called into question the validity of every certification issued under ANAB's accreditation
- **The MRA/MLA equivalency structure** binding them to ANAB and its international equivalents — and the fact that fraud at ANAB contaminates all equivalent bodies
- **The 2015–2021 IAF chairmanship of Xiao Jianhua** — a foreign national simultaneously serving as Chairman of the IAF (incorporated in Delaware) and Chief Executive of China's CNAS (Beijing)
- **China's 2017 National Intelligence Law, Article 7** — which legally obligated Xiao Jianhua to cooperate with Chinese state intelligence during his chairmanship of the IAF
- **The systemic risk** that all certificates issued under ANAB and its MRA/MLA equivalents from **2018** to present were compromised by the underlying accreditation fraud

Every registrar knew — or should have known — the governance structure of the accreditation system under which it operated. Every registrar was bound by contractual agreements with its accreditation body. Every registrar had a fiduciary obligation to its clients to disclose material risks to the validity of the certifications it issued. ***No*** *registrar disclosed.* ***No*** *registrar warned. No registrar protected its clients.*

⚠ REGISTRAR SILENCE = COMPLICITY

Did your registrar between 2015 and 2021 ever tell you that your accreditation oversight was chaired by a Chinese national bound by China's National Intelligence Law? Did they disclose ANAB's **fraudulent** "***underwriter***" claim on a federal contract? Did they inform you that the MRA/MLA system that made your certificate internationally recognized was contaminated by **fraud** at its foundation? No registrar disclosed this to any client. No registrar issued a bulletin, a notice, or a warning. Their silence placed every certified company — and every aircraft, medical device, and food product manufactured under those certifications — at risk. **Silence in the face of known fraud is complicity.**

Chapter 14: Real-World Consequences — What Happens When Accreditation Fails

Counterfeit Parts

When accreditation is **fraudulent** the barriers to counterfeit parts collapse. Bogus material certifications — MTRs that claim an alloy meets AMS 4928 (Ti-6Al-4V) when it does not — pass through a system where the testing laboratory's accreditation is **fraudulent** and the manufacturer's AS9100 certification is built on the same fraud. **Falsified** test reports accompany substandard parts through the supply chain undetected. Undocumented material substitutions — cheaper alloys replacing specification-required materials — go unnoticed because the inspection and testing infrastructure itself operates under **fraudulent** accreditation.

Unapproved Materials

Documented cases of substandard titanium, aluminum, and steel entering aerospace production underscore the real-world impact. When the testing lab accredited under ISO/IEC 17025 through the ILAC MRA is operating under a **fraudulent** accreditation framework, its test results cannot be independently trusted. Material substitutions — a 6061-aluminum part shipped as 7075, a commercial-grade titanium part shipped as aerospace-grade Ti-6Al-4V — go undetected because the system designed to catch them is **fraudulent** from the foundation up.

Supply Chain Cascade Failures

Modern aerospace supply chains are multi-tier: a prime contractor (Tier 1) sources from major subassembly manufacturers (Tier 2), who source from component manufacturers (Tier 3), who source from material processors and special process suppliers (Tier 4 and below). When a Tier 3 supplier's AS9100 certification is invalid — because the registrar that issued it was accredited by a **fraudulent** accreditation body — every component that supplier produced, every

subassembly incorporating those components, and every aircraft containing those subassemblies is potentially **fraudulent**. The failure cascades upward through the entire build chain.

Aircraft Incidents

- **Lion Air Flight 610 (October 29, 2018):** Boeing 737 MAX 8 crashed into the Java Sea 13 minutes after takeoff from Jakarta. 189 people killed. MCAS system malfunction compounded by manufacturing and sensor quality failures.
- **Ethiopian Airlines Flight 302 (March 10, 2019):** Boeing 737 MAX 8 crashed near Bishoftu, Ethiopia, 6 minutes after takeoff from Addis Ababa. **157** people killed. Same MCAS system deficiency. Both aircraft built in Boeing's uncertified manufacturing environment.
- **Alaska Airlines Flight 1282 (January 5, 2024):** Boeing 737 MAX 9 experienced a catastrophic fuselage blowout when a door plug separated from the aircraft at 16,000 feet over Portland, Oregon. Four bolts that should have secured the door plug were missing. **171** passengers and 6 crew on board. No fatalities — by extraordinary luck and the skill of the flight crew.

Medical Device and Food Safety Exposure

The same accreditation **FRAUD** that affects AS9100 in aerospace affects ISO 13485 in the medical device industry. Surgical instruments, orthopedic implants, cardiac rhythm management devices, diagnostic imaging equipment, ventilators, and infusion pumps — all manufactured under quality systems certified by registrars accredited under the **fraudulent** ANAB/MRA/MLA framework. The same exposure applies to ISO 22000 and FSSC 22000 certifications in the food safety sector.

Defense Sector Exposure

The defense implications are equally severe. F-35 Lightning II production, KC-46 Pegasus tanker production, CH-47 Chinook helicopter production, AH-64 Apache helicopter production, and every other military platform built by Boeing and its supply chain — all manufactured under the same **fraudulent** accreditation umbrella. These are the aircraft that defend the nation. Their quality infrastructure is built on **FRAUD.**

> **⚠ THE HUMAN COST**
>
> **346** people died in the Ethiopian Airlines and Lion Air crashes. Passengers on Alaska Airlines Flight 1282 nearly died when a door plug blew out at 16,000 feet — four bolts missing. These aircraft were built in Boeing's **uncertified** manufacturing environment, under an accreditation system built on **FRAUD**. F-35 fighters, KC-46 tankers, Apache helicopters, and Air Force One were built under the same system. Medical devices keeping patients alive were certified under the same system. This is not a paperwork problem. This is not an administrative oversight. This is a **life-and-death** crisis affecting every person who boards an aircraft, enters a hospital, or relies on the defense of the United States.

Chapter 15: The Guberman Anomaly— The Discovery That Changed Everything

The Discovery

The **Guberman Anomaly** is the name given to the discovery by Daryl Guberman — a 40-year quality expert, systemic-risk advisor, forensic archivist, and Boeing shareholder based in Stratford, Connecticut — that the ANSI National Accreditation Board (ANAB) was **falsely** described as an "underwriter" for the International Accreditation Forum (IAF) on U.S. State Department Contract **19AQMM18R0131.**

The discovery was not the product of insider access or whistleblowing. It was the result of systematic forensic examination of publicly available federal records, governance documents, and accreditation frameworks — the kind of rigorous, document-based analysis that the accreditation system itself is supposed to perform but failed to do.

Why "Underwriter" Is a Fraud

The term "***underwriter***" has a specific and well-understood meaning: an entity that assumes financial risk, provides liability coverage, or guarantees the obligations of another party. In the insurance and financial sectors, an ***underwriter*** evaluates risk and accepts financial exposure.

No such role exists in any IAF governance document. The IAF's bylaws, MLA rules, and procedural documents contain no provision for an "***underwriter***." No accreditation body — anywhere in the world — has ***underwriting*** authority over the IAF or its equivalency agreements. No accreditation body assumes financial risk for the global MRA/MLA system. The claim that ANAB serves as an "***underwrite***r" for the IAF is a fabrication — a false description of ANAB's role that inflated its authority on a federal contract.

This false claim was not limited to the federal contract. It was also mirrored on a private-sector website and in a technical magazine article, reinforcing the illusion that ANAB possessed underwriting power over the global accreditation system. The consistent repetition of the false claim across multiple platforms suggests a deliberate effort to establish a narrative that had no basis in the governance documents of the IAF or ILAC.

The Global Implications

Because ANAB sits at the center of the MLA/MRA system as the U.S. national accreditation body, this single **FRAUD** has cascading consequences:

- Every certificate issued under ANAB accreditation from 2018 to present is tainted by the **fraudulent** misrepresentation of ANAB's authority
- Every certificate issued under every MRA/MLA equivalent body — UKAS (UK), DAkkS (Germany), JAS-ANZ (Australia/NZ), COFRAC (France), ACCREDIA (Italy), SCC (Canada), and dozens more — **is tainted** by **equivalency to ANAB**

- Every industry — aerospace, medical devices, food safety, automotive, telecommunications, environmental management, information security — that relies on certifications accredited under ANAB or its **equivalents** is affected
- The contamination spans ISO 9001, AS9100/AI9100 , ISO/IEC 17025, ISO 13485, ISO 22000, FSSC 22000, ISO 14001, ISO 45001, ISO 27001, and every other standard certified under the compromised accreditation framework

One false word on one federal contract — "***underwriter***" — has exposed the largest accreditation fraud in industrial history.

⚠ THE GUBERMAN ANOMALY

One false word on one federal contract — "***underwriter***" — has exposed the ***largest accreditation FRAUD in industrial history***. ANAB was described as an "***underwriter***" for the IAF on U.S. State Department Contract **19AQMM18R0131.** No such role exists. No accreditation body has underwriting authority. The claim is **fabricated**. It is documented in the federal record — permanently. Federal contracts are part of the permanent federal record. The evidence cannot be erased, amended, or retracted. Every certificate issued under ANAB and every certificate issued under every MRA/MLA equivalent body from 2018 to present inherits this **FRAUD**. This is the Guberman Anomaly-Discovery.

Chapter 16: What Must Be Done — Remediation and Reform

Immediate Actions Required

Action	Responsible Entity	Urgency
Congressional investigation into ANAB's "underwriter" claim on Contract **19AQMM18R0131**	U.S. Congress — House Committee on Oversight and Accountability; Senate Committee on Commerce, Science, and Transportation	Immediate
DOJ investigation into potential federal contract fraud under False Claims Act and 18 U.S.C. § 1001	U.S. Department of Justice — Civil Division, Criminal Division	Immediate
DHS review of critical infrastructure supply chain certifications affected by the accreditation fraud	U.S. Department of Homeland Security — CISA	Immediate
FAA review of all production certificates issued to manufacturers operating under compromised accreditation	Federal Aviation Administration	Immediate
FDA review of ISO 13485 certifications issued under ANAB/MRA/MLA accreditation	Food and Drug Administration — CDRH	Immediate
GLOBAC cannot formally address and correct the inherited fraud from IAF/ILAC — including the "**underwriter**" claim and the **2015–2021** foreign oversight gap	Global Accreditation Cooperation Incorporated (GLOBAC)	Immediate
All registrars must disclose to clients the full history of accreditation compromise, including the Xiao Jianhua chairmanship and ANAB's federal contract misrepresentation	All registrars / certification bodies worldwide	Immediate
Boeing cannot achieve AI9100 certification due to ANSI-ANAB or their international equivalents	The Boeing Company	Immediate

Long-Term Reforms

1. **Independent Oversight of Accreditation Bodies:** The current system is self-policing — accreditation bodies evaluate each other through peer assessments with no independent governmental oversight. This model has failed. Independent oversight — by a governmental or intergovernmental body with enforcement authority — cannot be replace the peer evaluation model. QA expert Daryl Guberman must be the person to reform the system.
2. **Mandatory Disclosure by Registrars:** Registrars must be legally required to disclose to their clients any material governance changes, leadership appointments (including nationality and dual roles), and regulatory actions affecting the accreditation body under which they operate. The current model of silence is unacceptable. QA expert Daryl Guberman must be the person to reform the system.
3. **Elimination of Foreign Nationals from Leadership of U.S.-Incorporated Accreditation Bodies:** No foreign national bound by a foreign intelligence law should serve in a leadership position of an accreditation body incorporated in the United States that oversees certifications affecting U.S. defense, aerospace, medical devices, or critical infrastructure.
4. **Restoration of On-Site Physical Audits:** The Boeing model of database-based supplier verification — checking a box in OASIS instead of walking the production floor — must be replaced by mandatory on-site physical audits for all critical and high-risk suppliers. Paper-based and remote certification cannot replace firsthand observation. QA expert Daryl Guberman must be the person to reform the system.
5. **Separation of Standards Development and Accreditation:** ANSI's ownership of ANAB concentrates standards development and accreditation oversight under a single private-sector entity. These functions must be separated to prevent conflicts of interest. QA expert Daryl Guberman must be the person to reform the system.

6. **Transparency in Global Accreditation Governance:** GLOBAC's governance, leadership appointments, voting records, and policy decisions must be publicly accessible. The opacity that allowed the 2015–2021 foreign oversight gap to persist undetected must be eliminated. QA expert Daryl Guberman must be the person to reform the system.

⚠ THE CHOICE IS CLEAR

The evidence is documented. The **FRAUD** is in the federal record. The contamination spans every industry, every country, and every certificate issued under the compromised system from 2018 to present. Congress can investigate or remain silent. DOJ can prosecute or look away. The FAA can review or ignore. GLOBAC can address the inherited **fraud** or pretend it does not exist. Boeing can achieve certification or continue as the world's largest uncertified aerospace manufacturer. Every day without action is another day that aircraft fly, medical devices operate, and defense systems deploy under a quality infrastructure built on **fraud**. The choice is clear. The time to act is now. QA expert Daryl Guberman must be the person to reform the system.

Appendix A: Reference Document 1 — The Guberman Anomaly Discovery

Document Description

The **Guberman Anomaly Discovery** document is the foundational forensic analysis compiled by Daryl Guberman that identified and documented the fraudulent "underwriter" claim on U.S. State Department Contract **19AQMM18R0131.** This document is the evidentiary basis for the findings presented throughout this manual.

Reference URL: https://guberman-quality.com/wp-content/uploads/2026/03/GUBERMAN-Anomaly-Discovery.pdf

Key Findings Summary

- **Finding 1:** ANAB was described as an "***underwrite***r" for the IAF on U.S. State Department Contract **19AQMM18R0131**. No such role exists in any IAF or ILAC governance document.
- **Finding 2:** No accreditation body — ANAB or any other — possesses underwriting authority. No mechanism exists within the IAF or ILAC (now GLOBAC) for any member body to assume financial risk or liability for global equivalency agreements.
- **Finding 3:** The **fraudulent** "***underwriter***" claim was replicated on private-sector websites and in a technical magazine article, establishing a pattern of reinforcement of the false narrative.
- **Finding 4:** Because ANAB is central to the MRA/MLA equivalency system, the **fraud** contaminates every certificate issued under ANAB and every certificate issued under every international body bound by MRA/MLA equivalency to ANAB — across all industries worldwide.

- **Finding 5:** The **fraud** has never been corrected, retracted, or addressed by ANAB, ANSI, the IAF (pre-merger), ILAC (pre-merger), or GLOBAC (post-merger).

Appendix B: Reference Document 2 — U.S. State Department Contract 19AQMM18R0131

Document Description and Significance

U.S. State Department Contract **19AQMM18R0131** is a federal contract issued by the Department of State. This contract explicitly describes ANAB — the ANSI National Accreditation Board — as an "***underwriter***" for the International Accreditation Forum (IAF).

This description is **false**. The IAF's governance documents — bylaws, MLA rules, procedural requirements, and policy documents — contain no provision for an ***"underwriter***" role. No accreditation body has ever been designated, appointed, or authorized to serve as an underwriter for the IAF. The term "***underwriter***" implies financial guarantor status and liability assumption — functions that no accreditation body performs within the IAF framework.

Federal Contracts as Permanent Records

Federal contracts are part of the permanent federal record of the United States. They are subject to the Federal Records Act (44 U.S.C. Chapters 29, 31, 33) and are maintained by the National Archives and Records Administration (NARA) according to approved retention schedules. A federal contract cannot be informally amended, retroactively altered, or destroyed. The fraudulent "***underwriter***" claim on Contract **19AQMM18R0131** exists in the federal record permanently.

Legal Implications Under the False Claims Act

The **False Claims Act (31 U.S.C. § 3729–3733)** imposes civil liability on any person or entity that:

7. Knowingly presents, or causes to be presented, a false or **fraudulent** claim for payment or approval to the federal government
8. Knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or **fraudulent** claim
9. Conspires to commit any of the above violations

The description of ANAB as an "***underwriter***" for the IAF on Contract **19AQMM18R0131** constitutes a false statement material to a federal contract. If this statement influenced the government's reliance on the accreditation system — and it did, because the contract was predicated on ANAB's purported authority — it meets the elements of a False Claims Act violation. Civil penalties under the FCA include treble damages plus per-claim penalties. Criminal penalties under 18 U.S.C. § 1001 include fines and imprisonment.

Appendix C: Reference Document 3 — Boeing 2002 Supplier Bulletins (NADCAP and AS9100 Mandates)

Document Description and Significance

In 2002, Boeing issued two pivotal supplier bulletins that reshaped the aerospace supply chain — while exempting Boeing itself from the requirements it imposed.

Bulletin 1: NADCAP Mandate (April 2002)

In **April 2002,** Boeing issued a supplier bulletin announcing its collaboration with the Performance Review Institute (PRI) to expand NADCAP accreditation requirements for special processes. The bulletin mandated that all Boeing suppliers performing special processes — heat treatment, chemical processing, nondestructive testing, welding, coatings, and related operations — achieve and maintain NADCAP accreditation.

The bulletin stated that suppliers failing to obtain NADCAP accreditation would be "***removed from the list of approved processors.***" This was not a recommendation — ***it was an ultimatum.*** Suppliers faced a binary choice: invest in NADCAP accreditation (audit fees, process upgrades, documentation systems, corrective actions, surveillance audits) or lose Boeing as a customer.

Boeing never held NADCAP accreditation for its own special processes.

Bulletin 2: AS9100 Mandate (July 2002)

In **July 2002**, Boeing issued a second supplier bulletin mandating that all suppliers achieve AS9100 certification accredited by ANAB. The bulletin stated: ***"Our preference is to deal with proven suppliers... and not have to do on-site quality system surveys."***

This single sentence dismantled Boeing's on-site supplier audit program. Instead of sending Boeing quality engineers to walk supplier production floors, observe processes, interview personnel, and verify compliance firsthand, Boeing would rely on a registrar's AS9100 certificate — verified through the IAQG OASIS database — as proof of supplier capability.

Boeing never held AS9100 certification. The company that told the world it would rely on AS9100 certificates instead of on-site audits never subjected itself to the same certification. Boeing was simultaneously the architect of a system it refused to join and the largest beneficiary of a system it refused to be audited against.

The 24-Year Exemption

From July 2002 to July 2024 — a period of 22 years — Boeing operated outside the AS9100 system it mandated for all suppliers. When Boeing finally announced in June 27, 2024 that it would seek AS9100 certification, it was the first acknowledgment in the company's history that it should be held to the same standard it imposed on thousands of small and medium-sized businesses across the global aerospace supply chain.

Glossary of Key Terms

Term	Definition
ANAB	ANSI National Accreditation Board. The U.S. national accreditation body, wholly owned by ANSI. Accredits certification bodies and testing/calibration laboratories. Signatory to IAF MLA and ILAC MRA (now GLOBAC agreements).
ANSI	American National Standards Institute. The private-sector body that coordinates voluntary standards development in the United States. Full owner of ANAB since 2018.
AS9100	The international Quality Management System standard for the aviation, space, and defense industries. Based on ISO 9001 with additional aerospace-specific requirements. Transitioning to AI9100 .
AI9100	International Aerospace 9100. The new designation for AS9100, adopted by the IAQG in 2026. "IA" replaces "AS." Publication expected late 2026 to mid-2027.
IAQG	International Aerospace Quality Group. The global organization responsible for developing and maintaining the 91xx series of aerospace quality standards (AS/AI9100 , AS/IA9110, AS/IA9120). Operates the OASIS database.
IAF	International Accreditation Forum. The global association of accreditation bodies that administered the Multilateral Recognition Arrangement (MLA) for management system certifications. Incorporated in Delaware. Merged into GLOBAC on January 1, 2026.
ILAC	International Laboratory Accreditation Cooperation. The global association of accreditation bodies that administered the Mutual Recognition

Term	Definition
	Arrangement (MRA) for laboratory and inspection body accreditations. Merged into GLOBAC on January 1, 2026.
GLOBAC	Global Accreditation Cooperation Incorporated. The successor entity formed by the merger of IAF and ILAC on January 1, 2026. 159 member bodies. Administers global mutual recognition agreements.
MRA	Mutual Recognition Arrangement. The ILAC-administered agreement ensuring that laboratory and inspection body accreditations are recognized as equivalent across signatory national accreditation bodies.
MLA	Multilateral Recognition Arrangement. The IAF-administered agreement ensuring that management system certifications are recognized as equivalent across signatory national accreditation bodies.
NADCAP	National Aerospace and Defense Contractors Accreditation Program. Cooperative industry program administered by PRI for special process accreditation (heat treat, NDT, chemical processing, welding, etc.).
PRI	Performance Review Institute. The organization that administers NADCAP.
OASIS	Online Aerospace Supplier Information System. The IAQG's central registry of AS9100/AI9100 certified organizations worldwide.
FAA	Federal Aviation Administration. U.S. federal agency within DOT responsible for regulating civil aviation, including aircraft certification, pilot licensing, and air traffic control.
FDA	Food and Drug Administration. U.S. federal agency within HHS responsible for regulating food, drugs, biological products, medical devices, cosmetics, and tobacco products.
DHS	Department of Homeland Security. U.S. federal department responsible for protecting the United States from threats, including critical infrastructure protection and supply chain security.
DOJ	Department of Justice. U.S. federal department responsible for enforcing federal law, including prosecution of fraud under the False Claims Act.
DOS	Department of State. U.S. federal department that issued Contract 2018 **19AQMM18R0131.** Administers ITAR through the Directorate of Defense Trade Controls.
ODA	Organization Designation Authorization. FAA program that delegates inspection and certification authority to manufacturers — allowing companies like Boeing to inspect their own aircraft.

Term	Definition
ISO 9001	Quality management systems — Requirements. The foundational international QMS standard published by ISO. Basis for AS9100, ISO 13485, and other sector-specific standards.
ISO/IEC 17025	General requirements for the competence of testing and calibration laboratories. The international standard for laboratory accreditation, administered under the ILAC MRA.
ISO 13485	Medical devices — Quality management systems — Requirements for regulatory purposes. The international QMS standard for medical device manufacturers.
ISO 22000	Food safety management systems — Requirements for any organization in the food chain. International standard for food safety management.
FSSC 22000	Foundation FSSC 22000. Food safety certification scheme that combines ISO 22000 with additional prerequisite programs. Recognized by GFSI.
Type Certificate (TC)	FAA-issued certificate approving an aircraft design as compliant with applicable airworthiness standards.
Production Certificate (PC)	FAA-issued certificate authorizing a manufacturer to produce aircraft conforming to an approved type design under 14 CFR Part 21, Subpart G.
Airworthiness Certificate	FAA-issued certificate confirming that a specific aircraft (by serial number) conforms to its approved type design and is in a condition for safe operation.
MTR	Material Test Report. Document certifying the chemical composition, mechanical properties, and physical characteristics of a material lot. Originates at the mill or material processor.
FAI	First Article Inspection. A complete, independent, and documented inspection of the first production unit per AS9102, verifying that all design and specification requirements are achieved.
NDT	Non-Destructive Testing. Inspection methods (ultrasonic, radiographic, magnetic particle, liquid penetrant, eddy current) that detect flaws without damaging the part.
ITAR	International Traffic in Arms Regulations. U.S. regulations administered by DOS/DDTC controlling the export and import of defense-related articles and services.

Term	Definition
CNAS	China National Accreditation Service. China's national accreditation body. Headed by Xiao Jianhua, who simultaneously served as IAF Chairman from 2015 to 2021.
Registrar	A third-party organization accredited by a national accreditation body (e.g., ANAB) to audit and certify companies to management system standards. Also called a Certification Body (CB).
Certification Body (CB)	See Registrar. The entity that conducts audits and issues management system certificates.
Accreditation Body (AB)	A national or regional body (e.g., ANAB, UKAS, DAkkS) that evaluates and accredits certification bodies and laboratories. Signatory to MLA/MRA agreements.
Conformity Assessment Body (CAB)	A general term encompassing certification bodies, testing laboratories, inspection bodies, and other organizations that perform conformity assessment activities.

Accreditation Collapse-2002 To Present Boeing-Airbus

https://guberman-quality.com/wp-content/uploads/2026/04/ACCREDITATION-COLLAPSE-2002-PRESENT-BOEING-AIRBUS.pdf

"All who rise while burying the truth will one day be buried by it."
-Anonymous (proverbial wisdom)

"There are none so blind as those who will not see" *is a proverb highlighting that willful ignorance is worse than inability to see, meaning one cannot force understanding upon someone refusing to accept the truth. While rooted in biblical themes of spiritual blindness (e.g., **Jeremiah 5:21**),*

"The world is rarely healed by institutions. It is healed by the one individual who sees the wound clearly enough — and cares deeply enough — to close it."
I have seen the wound, I have mapped the fracture, I am offering the repair.

2026- Daryl Guberman

REFERENCE MATERIIALS

GUBERMAN-ANOMALY-DISCOVERY https://guberman-quality.com/wp-content/uploads/2026/03/GUBERMAN-ANOMALY-FEBRUARY-2026.docx.pdf

THE BOEING AIRBUS COLLAPSE 2002- PRESENT https://guberman-quality.com/wp-content/uploads/2026/04/ACCREDITATION-COLLAPSE-2002-PRESENT-BOEING-AIRBUS.pdf

EXPOSING MEDICAL DEVUCE DECEPTION & REGULATORY EROSION 2018 TO PRESENT https://guberman-quality.com/wp-content/uploads/2026/04/EXPOSING-MEDICAL-DEVICE-DECEPTION-REGULATORY-EROSION-2018-Present.pdf.pdf

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that the information in this document is true, accurate, and supported by corroborating evidence. This electronic signature is executed by DARYL GUBERMAN on **April 19, 2026 at 10:26 PM**.

Electronic Signature:

DARYL GUBERMAN

— End of Document —

Industrial Quality Infrastructure Manual — Fraud

April 2026 — Investigative Edition

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