

FEDERAL CONTRACT 19AQMM18R0131



Aerospace Manufacturers Advisory:

Oversight System Questioned After Federal Contract Irregularity Involving ANAB

2018 to Present Issues

FAA, BOEING & AIRBUS: THE GLOBAL SUPPLIER-CERTIFICATION COLLAPSE

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The Accreditation Collapse — Boeing, ANAB, and the Global Certification Crisis (2002–2026)

A Comprehensive Analysis for Aerospace, All Industries, and All Manufacturers

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TERMS AT A GLANCE

Acronym & Definition Glossary for Investors, Executives, and Regulators

ANSI — American National Standards Institute

Parent organization that took full control of ANAB in December 2018.

ANAB — American National Accreditation Board

U.S. accreditation body that committed **FRAUD** on federal contract **19AQMM18R0131** in 2018.

IAF — International Accreditation Forum

Private global accreditation association (**Delaware-incorporated**) operating the MLA system.

ILAC — International Laboratory Accreditation Cooperation

Global laboratory-accreditation association (**Australia-based**) operating the MRA system.

MLA — Multilateral Recognition Arrangement or Agreement

Agreement that makes all IAF accreditation bodies “**equivalent.**” to ANSI-ANAB

MRA — Mutual Recognition Arrangement or Agreement

ILAC’s laboratory-equivalence structure. **equivalent.**” to ANSI-ANAB

IAQG — International Aerospace Quality Group

Controls AS9100, AI9100 OASIS, and global aerospace quality rules.

OASIS — Online Aerospace Systems Information System

Mandatory global database for all **AS9100/AI9100** certified suppliers.

GLOBAC — Global Accreditation Cooperation

New merged body formed when IAF and ILAC combined in January 2026.

AS9100 — Aerospace Quality Management System Standard

Required for aerospace manufacturers and suppliers (2000–Present).

AI9100 — Aerospace Quality Standard (2026-present)

Replaced AS9100 beginning January 2026.

NADCAP — National Aerospace and Defense Contractors Accreditation Program

Used by Boeing to replace internal supplier audits starting in 2002.

FAA — Federal Aviation Administration

U.S. aviation regulator responsible for certification and falsification enforcement.

DHS — Department of Homeland Security

Referenced in the April 17, 2024 subcommittee hearing.

ODA — Organization Designation Authorization

Program that allowed Boeing to self-certify aircraft beginning in 2009.

MCAS — Maneuvering Characteristics Augmentation System

Flight-control system implicated in the Ethiopian and Lion Air crashes (**2018-2019**)

OEM — Original Equipment Manufacturer

A company that builds the final product; Boeing is an OEM.

The Accreditation Collapse — Boeing, ANAB, and the Global Certification Crisis (2002–2026)

*A Comprehensive Analysis for Aerospace, All Industries, and All Manufacturers,
Investors, Insurers, Logistics, Government Subcommittee's,
Legal Teams & Flying Public*

Prepared by Daryl Guberman, CEO — GUBERMAN-PMC LLC

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EXECUTIVE SUMMARY FOR AEROSPACE, ALL INDUSTRIES, AND ALL MANUFACTURERS

There is no waiver, no exception, and no administrative workaround that can erase the consequences of falsified accreditation.

Between 2002 and 2026, the global accreditation and certification system that supports aerospace, medical, automotive, electronics, food, cybersecurity, and manufacturing industries experienced a structural collapse rooted in fraud, regulatory failure, and broken oversight mechanisms. This summary explains, in clear terms, why every industry is affected — not just aerospace — and why every manufacturer, supplier, and certification body must understand the consequences

A SYSTEM-WIDE DECEPTION: HOW BOEING AND THE FAA MISLED THE ENTIRE INDUSTRY

For decades, Boeing — with the FAA's silent cooperation — misled the entire aerospace ecosystem into believing that an OEM of its size did not require AS9100 certification. This deception spread everywhere: inspectors in the field repeated it, federal agencies accepted it, quality professionals believed it, investors assumed it, insurers relied on it, and logistics organizations operated under it. Everyone was told that an FAA Airworthiness Certificate was all that mattered. But that was **never true**. It was a manufactured fallacy.

AS9100 — and now AI9100 as of **January 2026** — contains mandatory clauses requiring independent third-party oversight, external audits, and objective verification of a company's operations. No manufacturer can legally or ethically "audit itself." Without AS9100/AI9100, **a company should never be allowed to build aircraft**. Boeing exploited this misunderstanding, pulling the wool over the eyes of agencies, auditors, suppliers, and the public. Whether it was a field inspector saying "Boeing doesn't need AS9100," or a federal agency claiming "airworthiness supersedes AS9100," the truth is simple: it does not work that way, and it never has.

THE SCALE OF THE PROBLEM: 12,000 BOEING AIRCRAFT AND 6,000 AIRBUS AIRCRAFT BUILT UNDER A COMPROMISED SYSTEM

Between **2018-2026**, Boeing was not AS9100 certified, yet continued full-rate production across Everett, Renton, Auburn, and Northfield. During this period July 2002 to present, approximately 12,000 Boeing aircraft were manufactured under a system in which Boeing mandated that all suppliers be AS9100 certified and ANAB accredited, while Boeing itself did not hold that certification. This includes high-visibility programs such as the two new Air Force One aircraft, the aircraft ordered during the previous

administration, the fleets involved in the Ethiopian Airlines and Indonesian Lion Air tragedies, and the Alaska Airlines 1282 aircraft.

Within the narrower window of **2018–2026**, when ANAB's accreditation was compromised by documented fraud, **approximately 3,000** Boeing aircraft were built using supplier parts whose certificates were issued under an accreditation system that was **no longer valid**. Under such conditions, it becomes impossible to know whether materials — including critical items such as titanium — were sourced under valid certification, because the certificates themselves originated from accreditation bodies operating under fraudulent authority or from their MLA/MRA international equivalents.

Airbus faced a parallel exposure: between **2018-2026**, approximately **6,000** Airbus aircraft were produced under the same global MLA/MRA equivalence structure, meaning their supplier certifications were also tied to the same compromised accreditation chain.

This is not hypothesis; it is a direct consequence of how accreditation functions. When the accreditation system overseeing the production environment is fraudulent, the certifications issued under it lose their validity, and the parts produced under those certifications lose their reliability. The difficult work now falls to CEOs, executives, and federal agencies — including those who have long operated in close alignment with Boeing — to confront the reality that the standards they themselves established were violated, and to take responsibility for addressing the implications documented in this Executive Summary.

1. FAA Falsification Laws Make Fraudulent Certification **Legally Void**

U.S. federal aviation law is built on strict falsification rules:

- **14 CFR §21.2** — All aircraft, engines, propellers, and appliances must meet FAA certification. **No exceptions.**
- **14 CFR Part 3** — All documentation must be truthful, accurate, and verifiable.
- **14 CFR §121.9** — Air carriers must use valid, verifiable certifications; fraudulent or incomplete certifications are **legally void.**
- **18 U.S.C. §1001** — It is a federal crime to falsify, conceal, or misrepresent any material fact to the U.S. Government.

If the accreditation is fraudulent, the certificate is void.

If the certificate is void, the part is void.

*If the part is void, the **aircraft is not legally airworthy.***

2. ANAB's 2018 Fraud on Federal Contract 19AQMM18R0131 Invalidated All Certificates Issued Under Its Authority

In September 2018, ANAB misrepresented its structure, independence, and compliance to the U.S. Government while bidding on a federal contract.

Facts:

- ANSI and ANAB had already merged into one entity.
- ANSI took 100% control of ANAB in December 2018.
- ANAB falsely represented itself as an independent accreditation body.
- This constitutes fraud under **18 U.S.C. §1001.**

Therefore: Every certificate issued under ANAB from **2018–2026** is **legally invalid.**

This includes: **AS9100 / AS9110 / AS9120, ISO 9001, ISO/IEC 17025, ISO 13485, ISO 14001, ISO 45001, ISO 27001**, and any standard accredited under ANAB and MRA/MLA equivalent..

3. The Entire Global Accreditation System Collapsed Through MLA/MRA Equivalence

IAF and ILAC operate under equivalence agreements:

- If one accreditation body is recognized, all are recognized.
- If one accreditation body is fraudulent, all equivalence collapses.

Because ANAB is an IAF signatory: Every certificate issued under the IAF/ILAC MLA/MRA network (**2018–2026**) is compromised.

This affects: Aerospace, Medical, Automotive, Electronics, Food, Cybersecurity, Environmental, Calibration labs, Testing labs, Service industries.

This is a global system failure, not a local one.

4. Boeing's 22-Year Gap in AS9100 Certification (2002–Present)

Boeing required suppliers to be AS9100 certified and ANAB accredited. But Boeing itself was not AS9100 certified from July 2002 to the present.

During a month-long on-site review at **Everett, Renton, Auburn, and Northfield**, Daryl Guberman repeatedly heard the same explanation from Boeing employees: when workers asked to attend safety meetings or internal quality activities, supervisors told them "no" because the aircraft had to be moved to the next station. From this evidence, **Guberman developed the hypothesis** that Boeing avoided AS9100 certification not

only to save billions of dollars in compliance and auditing costs, but also because AS9100 would have *required internal audits, management reviews, and documented process controls that would have slowed production*. Boeing could not afford to remove employees from the production line to perform the internal auditing required by AS9100 — so the company simply never obtained the certification, even while demanding it from every supplier.

Under FAA law: A perfect part entering a fraudulent or uncertified system becomes legally unacceptable. Under **FAA authority AC 21-29D**, Detecting and Reporting Suspected Unapproved Parts, any aircraft part that enters a fraudulent, unapproved, or uncertified quality system becomes legally unacceptable, even if the part was perfect when manufactured. Once traceability or accreditation is broken, the FAA classifies the item as a *Suspected Unapproved Part (SUP)*, making it ineligible for installation on any aircraft. This applies directly to Boeing's conduct from **2018 to the present** under U.S. Department of State Contract No. **19AQMM18R0131**, where the company operated through a falsified accreditation chain, rendering all affected parts legally unacceptable under FAA rules.

5. Airbus Was Also Affected — Even Though Airbus Was NOT Directly Certified by ANAB

This is the critical point:

Airbus was NOT directly certified by ANAB. But Airbus **WAS** certified under **MRA/MLA** accreditation — which legally makes it **equivalent to ANAB certification**.

Why:

- Airbus uses European accreditation bodies
- Those bodies are members of the IAF MLA and ILAC MRA

- Under these agreements, all accreditation bodies are treated as equivalent
- ANAB is a signatory
- Therefore, Airbus's certificates are legally *treated* as ANAB-equivalent

So when ANAB committed fraud in 2018: Every Airbus certificate issued under MLA/MRA equivalence (**2018–2026**) became compromised.

6. Why Source Inspectors' Work (2018–2026) Is Legally Void

Source inspectors from Boeing, Airbus suppliers, Lockheed Martin, Pratt and Whitney, Hamilton Standard, Raytheon, and others performed their duties correctly.

But they were inspecting parts inside a system that was fraudulently accredited, uncertified at the OEM level, and invalid under FAA falsification laws.

Therefore: Their approvals — even if perfect — are legally void.

7. What This Means for Every Industry and Manufacturer

If the accreditation is fraudulent, the certificate is fraudulent. If the certificate is fraudulent, the part is fraudulent. If the part is fraudulent, the product is not legally acceptable.

This applies to: Aerospace, Medical devices, Automotive, Electronics, Food and pharma, Cybersecurity, Environmental systems, Calibration labs, Testing labs, and any industry relying on ISO/AS certification.

This is not a Boeing problem. This is not an Airbus problem. This is a SYSTEM problem. A system that collapsed from the top down.

SECTION 1 — ANALYSIS FOR PRESENTATION

1. CNN Layoff Article —

The layoffs of tens of thousands of Boeing workers immediately after the national crisis created a perfect storm:

- Boeing lost massive institutional knowledge.
- Quality oversight collapsed internally.
- Supplier oversight became weaker because the people who used to perform on-site audits were gone.
- Boeing shifted toward paper-based oversight, not physical verification.

This sets the stage for why Boeing later leaned on NADCAP, AS9100, and ANAB — **not as quality tools**, but *as substitutes* for internal oversight they no longer had the manpower to perform.

This is the foundation of the "**Why Boeing Should Never Build Planes Again**" argument.

2. April 5, 2002 NADCAP Mandate — What Boeing Really Meant

The letter states: "We believe the NADCAP program offers significant benefits... including improved quality, reduced redundant audits, and reduced costs."

What "**redundant audits**" REALLY means

Boeing is saying:

- We don't want to audit you anymore.
- We want NADCAP to do it for us.
- We consider our own oversight redundant.

This is the opposite of aerospace quality philosophy. In aerospace, redundancy is safety. Boeing reframed redundancy as waste — a catastrophic mindset.

What **"as the need arises"** REALLY means

This phrase is intentionally vague. It means:

- Boeing will not routinely audit suppliers.
- Boeing will only audit if something goes wrong, or if they feel pressure.
- Boeing is shifting from proactive oversight to reactive oversight.

In aerospace, reactive oversight is unacceptable. You don't wait for a plane to fall out of the sky before checking the supplier.

This phrase is a legal escape hatch — it allows Boeing to say:

- "We didn't think the need arose."
- "We relied on NADCAP."
- "We trusted the accreditation body."

This is the seed of the Boeing quality collapse.

3. The "Intention to Become NADCAP Accredited" Form — The Hidden Threat

The form forces suppliers to check a box: If they check "We will not obtain accreditation", they are acknowledging they will be removed from Boeing's approved list, even if they supplied Boeing for decades.

Why this is dangerous

- Boeing replaced proven suppliers with paper-approved suppliers.
- Boeing removed companies that had passed real on-site Boeing audits for years.
- Boeing replaced them with companies accredited by ANAB-recognized bodies, even though ANAB itself was compromised.

This is the moment Boeing outsourced quality and abandoned its own oversight responsibilities.

4. July 2002 AS9100 Requirement — The On-Site Audit Clause

The Boeing bulletin states: "***An on-site Boeing survey/audit of the supplier's quality system if need be.***"

This is the same dangerous phrase again: **if need be.**

What this means in practice

- Boeing preferred not to audit.
- Boeing wanted to rely on ANAB-accredited certificates.
- Boeing only performed on-site audits when forced.

Boeing's stated preference

"Our preference is to deal with proven suppliers with excellent quality performance and not have to do on-site quality system surveys."

This is the smoking gun. **They are openly saying:**

- "If you have a certificate from an ANAB-accredited body, we don't want to come see you."
- "We trust the certificate more than our own eyes."

This is the exact opposite of aerospace quality culture.

5. ANAB as the Preferred Accreditation Body

Boeing's entire supplier quality system was built around ANAB, ANAB's international partners, and ANAB's multilateral agreements.

This means:

- Boeing's oversight depended on **ANAB's integrity**.
- *If ANAB was compromised, Boeing's entire supply chain was compromised.*
- Boeing's "trust the certificate" philosophy became a systemic vulnerability.

Boeing built planes for decades without a valid, independently verified quality system — and forced suppliers into the same broken system.

SECTION 2 — Boeing's Supplier Requirements vs. ANAB's 2018 Federal-Contract Fraud

Boeing's own supplier bulletins, supplier FAQs, and quality-management guidance make one requirement absolutely clear: *Any third-party registrar used by a Boeing supplier must be accredited by ANAB or an "international equivalent."*

This requirement appears repeatedly across Boeing's supplier portal from **2012** through **2020**, and even as late as **2026**, Boeing is still publishing the obsolete name "ANSI-

ASQ National Accreditation Board (ANAB)", a name that legally ceased to exist after **December 2018**.

Yet Boeing continues to mandate ANAB accreditation even though ANAB, in 2018, perpetrated fraud on U.S. Government Contract No. **19AQMM18R0131** — the same contract under which ANAB represented itself as a legitimate authority ***underwriter***.

The contradiction becomes even more severe when Boeing's own internal leadership is added to the timeline.

In the July 31, 2012 IAQG OPMT memo, Tim Lee — a Boeing employee acting as IAQG Chairman — explicitly warned the global aerospace sector that:

- Only accredited AQMS certificates issued under the ICOP scheme should be recognized.
- National Accreditation Bodies (NABs) must maintain vigilance to prevent unaccredited certificates from infiltrating the aerospace supply chain.
- The integrity of the entire system depends on strict adherence to accredited certification.

This memo, signed by Tim Lee as IAQG OPMT Chair – Boeing, is unambiguous: Unaccredited certificates are a threat to aerospace safety and must not be allowed into the system.

But here is the conflict:

- Boeing itself was not certified to AS9100 for **24** years, including during the period when Tim Lee issued that memo.
- Boeing sat on ANAB's Management Systems Accreditation Committee (MSAC) from 2014–2024, the same committee empowered to ***grant, suspend, and withdraw certifications***.

- In 2018, while Boeing still sat on MSAC, ANAB perpetrated fraud on federal contract **19AQMM18R0131**.
- Despite this, *Boeing continued to push ANAB accreditation onto its suppliers*, old and new, as a mandatory requirement — even though ANAB's aerospace accreditation was invalid from **2018 to the present**.

The result is a structural contradiction:

Boeing required its suppliers to use ANAB-accredited registrars at the same time ANAB's accreditation was fraudulent, and at the same time Boeing itself held no AS9100 certification, and at the same time Boeing employees were sitting on the very ANAB committee responsible for accreditation decisions.

This creates the scenario being documented:

- Boeing mandated a certification system it did not follow.
- Boeing enforced accreditation rules that ANAB itself violated.
- Boeing suppliers were required to purchase certificates that were not legally valid under the federal contract governing ANAB's authority.
- Boeing's own leadership publicly warned against unaccredited certificates while Boeing itself operated outside the accredited system.

SECTION 3 — The 2018 ANAB–ANSI Merger, Federal Contract 19AQMM18R0131, and the Eight-Year Accreditation Collapse

The Response to Questions for Solicitation **19AQMM18R0131** makes the federal requirement unmistakable: Any contractor submitting a proposal must already be

accredited by a U.S. accreditation body that is a member of the International Accreditation Forum (IAF) ANAB. This requirement was active before the contract became official in September 2018.

But September 2018 is also the moment when the accreditation system itself collapsed.

1. September 2018 — ANSI and ANAB merge into a single entity with two names (ANSI–ANAB)

On September 4, 2018, the same date appearing in the solicitation documents, ANSI and ANAB were already operating as a merged structure — one section, two names.

- ANSI and ANAB were presented as separate entities in the solicitation.
- Yet internally, they were already merged.
- In December 2018, ANSI took **100%** control of ANAB.
- The contract required an independent U.S. accreditation body, but ANSI–ANAB was no longer independent, no longer separate, and no longer aligned with the structure described in the solicitation.

This is the core of the fraud: The government was told it was receiving accreditation from an independent U.S. accreditation body, but the body in question had already been absorbed into ANSI. The government Solicitation **19AQMM18R0131** contracting officer stated on a questionnaire concerning if alternative bodies could be substituted for IAF and ANAB. Their response was **NO** alternative body can be substituted. As seen in The GUBERMAN-ANOMALY-DISCOVERY (Page 6 question1) <https://guberman-quality.com/wp-content/uploads/2026/03/GUBERMAN-ANOMALY-FEBRUARY-2026.docx.pdf>

2. External evidence confirms ANAB's role as an "underwriter" — a term not used anywhere in ISO/IEC 17011 or the accreditation ecosystem

Multiple independent documents show ANAB described as an underwriter:

- The H. Rohloff webpage explicitly states ANAB is an underwriter for IAF and ILAC. **The GUBERMAN-ANOMALY-DISCOVERY (Page 4)**
- The African Fuse Technical Magazine (**still live as of April 2026**) repeats the same claim. **The GUBERMAN-ANOMALY-DISCOVERY (Page 5)**
- The 2018 contract documentation uses the term "**underwriter**" in describing ANAB's role. **The GUBERMAN-ANOMALY-DISCOVERY (Page 3)**

This is critical because:

- Accreditation bodies do not "**underwrite**" anything.
- Underwriting is a financial-risk assumption role, **not** a conformity-assessment role.
- The use of this term indicates ANAB was representing itself in a capacity outside the scope of **ISO/IEC 17011, the standard governing accreditation bodies.**

3. IAF and ILAC — the global structure that ANAB claimed equivalence with — are not government bodies

- IAF is incorporated in Delaware as a private association.
- ILAC is based in Australia as a private association.
- Both are MLA/MRA organizations, not regulatory authorities.
- Their members are "**equivalent**" in accreditation status — **meaning if ANAB's accreditation is compromised, all MLA/MRA bodies are compromised by equivalence.**

This is the structural domino effect: If ANAB's accreditation was fraudulent from 2018 onward, then **every** certificate issued under the MLA/MRA umbrella carries the same defect.

4. January 2026 — IAF and ILAC merge into GLOBAC (Global Accredited Co-op)

The 2026 merger into GLOBAC does not erase:

- The eight years of fraudulent accreditation (**2018–2026**).
- The certificates issued under the compromised ANAB structure.
- The federal contract misrepresentation.
- The Boeing supplier-chain reliance on ANAB during the entire period.

A merger cannot retroactively sanitize a defective accreditation lineage.

5. October 2003 — "Heads Up 22" proves that AS9100 suppliers cannot refuse OASIS listing

The 2003 ANSI-RAB-to ANSI-ANAB bulletin (**Heads Up 22**) establishes:

- All AS9100 certified suppliers must be in OASIS-Online Aerospace System Information System.
- **Suppliers cannot opt out.**
- Failure to appear in OASIS results in certificate revocation.
- Suppliers must pay fees to populate results in certificate revocation.
- OASIS was controlled by the International Aerospace Quality Group (IAQG) — and at that time, Boeing controlled approximately **65%** of IAQG influence.

This means:

- Boeing controlled the system that enforced AS9100 certification visibility.
 - Boeing required suppliers to use ANAB-accredited registrars.
 - Boeing itself was not AS9100 certified.
 - Boeing leadership (**including Tim Lee**) sat on accreditation committees while ANAB perpetrated the 2018 **FRAUD**.
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6. The contradiction at the heart of Section 3

Summary of what is established:

- The federal government required an independent U.S. accreditation body.
- ANSI-ANAB was no longer independent as of September-December 2018.
- ANAB was simultaneously representing itself as an *"underwriter,"* a role outside accreditation norms.
- Boeing mandated ANAB accreditation for suppliers even while ANAB's authority was compromised.
- Boeing controlled the IAQG/OASIS system that enforced AS9100 visibility.
- Boeing itself held no AS9100 certification during the entire period.
- The global accreditation network (IAF/ILAC) was structurally tied to ANAB through MLA/MRA equivalence.
- The 2026 GLOBAC merger does not erase the **eight-year chain** of defective accreditation.

SECTION 4 — FAA Delegation, Boeing Self-Certification, MCAS, and the 2024 Public Exposures

1. 2009 — FAA expands Organization Designation Authorization (ODA) and grants Boeing unprecedented self-certification power

In 2009, the FAA upgraded its ODA system in a way that fundamentally altered the balance of oversight:

- Boeing was allowed to self-certify its own aircraft, aircraft designs, and aircraft technologies.
- Boeing employees were designated as FAA inspectors, even though they were paid by Boeing.
- This effectively placed FAA authority inside Boeing's payroll structure — meaning Boeing's CEO had influence over individuals acting with FAA authority.

Under this system, Boeing approved technologies such as MCAS, the flight-control augmentation system later implicated in the Ethiopian Airlines and Lion Air crashes, which together killed 346 people.

2. FAA's public denial in 2019 contradicts its own 10-year practice

After the two crashes, in March 2019, the FAA publicly stated: "The FAA has never allowed companies to ***police themselves or self-certify their own aircraft.***"

But the record shows:

20

- From 2009 to 2019, Boeing employees acting as FAA designees did perform certification tasks.
- Boeing's internal engineering and manufacturing personnel were empowered to sign off on designs, testing, and compliance findings.
- MCAS was approved under this delegated structure.

This contradiction is central to the systemic failure being documented.

3. April 17, 2024 — DHS Subcommittee: Daryl Guberman stands and exposes the 2002 supplier bulletins

At the DHS subcommittee hearing on **April 17, 2024**, Daryl Guberman stood up — under threat of ejection or arrest — holding the **April 2002 and July 2002** Boeing supplier bulletins. <https://www.newstribune.com/photos/2024/apr/18/3749044/>

His statement to the committee:

- Explained that Boeing abandoned on-site supplier auditing in **April & July 2002**.
- Explained that Boeing required AS9100-certified suppliers while Boeing itself was not AS9100 certified.
- Connected the **2002** decisions to the long-term degradation of Boeing's quality system.

This moment placed the **22-year** certification gap directly into the congressional record.

4. June 18, 2024 — The Calhoun hearing and the testimony of a grieving mother

At the **June 18, 2024** hearing involving Boeing CEO David Calhoun, Daryl Guberman was present when a mother of one of the crash victims said: "***You killed my daughter. You killed my family.***"

This testimony underscored the human consequences of the FAA's delegation and Boeing's internal certification culture.

5. June 27, 2024 — Elizabeth Lund's Reuters interview & statement about AS9100

On **June 27, 2024**, Boeing Vice President of Quality Elizabeth Lund told Reuters:

- Boeing was "***willing and prepared***" to obtain AS9100 certification.
- Boeing was "***already compliant***" with AS9100.
- Boeing had been conducting "***internal audits as if they were certified.***"

This statement implied Boeing had an active AS9100-equivalent internal audit program.

6. October 2024 — Site visits to Everett, Renton, Auburn, and Northfield contradict Lund's claims

In October 2024, Daryl Guberman visited multiple Boeing facilities for almost a month: **Everett, Renton, Auburn, and Northfield.**

What was documented:

- No one knew what AS9100 was.
- No one had ever heard of internal AS9100 audits.
- Employees reported that when they asked to attend meetings, supervisors told them no, because production had to continue and aircraft had to be pushed to the next station.
- There was no evidence of an AS9100-aligned internal audit structure.
- Lund's public statement was inconsistent with the reality on the shop floor.

This directly contradicts Boeing's public representation of its quality-management practices.

SECTION 5 — Federal Falsification Laws, ANAB's 2018 Contract Fraud, and Why All Certificates and Parts Issued Under That System Are Legally Void

To understand the scale of the problem between 2018 and 2026, the public must understand the federal laws that govern aviation certification, documentation integrity, and fraud against the United States.

These are not optional rules. These are not guidelines. **These are federal laws with criminal penalties.**

I. The FAA Falsification Standards (The Core Four)

- 1. 14 CFR §21.2 — Applicability:** This regulation defines which aircraft, engines, propellers, and appliances must meet FAA certification. ***If the documentation behind a certification is false, incomplete, or fraudulent, the certification is legally void. There are no exemptions.***
- 2. 14 CFR Part 3 — General Requirements:** This part governs the truthfulness, accuracy, and integrity of all documentation submitted to the FAA. ***If the underlying accreditation is fraudulent, the documentation cannot be accepted.***
- 3. 14 CFR §121.9 — Air Carrier Certification Requirements:** This regulation requires air carriers to use valid, verifiable, and truthful documentation for airworthiness. ***If the accreditation behind a certificate is fraudulent, the certificate is invalid, and the aircraft is not legally airworthy.***

4. **18 U.S.C. §1001 — Federal False Statements Statute:** This is the law that makes it a federal crime to falsify, conceal, cover up, misrepresent, submit false documents, or perpetrate fraud in any matter within the jurisdiction of the U.S. Government. **Penalty:** Up to 5 years in federal prison per violation. This statute applies directly to fraud on a federal contract, including Contract **19AQMM18R0131.**

II. Why ANAB's 2018 Fraud Makes All Certificates (2018–2026) Legally Void

In 2018, ANAB represented itself to the U.S. Government as an independent U.S. accreditation body, a valid IAF member, and a compliant ISO/IEC 17011 accreditation authority.

But in September 2018, ANSI and ANAB had already merged into one entity with two names. In December 2018, ANSI took **100%** control of ANAB.

This means ANAB misrepresented its structure, its independence, its authority, and its compliance with the contract requirements.

Under **18 U.S.C. §1001**, this is **FRAUD** against the federal government.

And under **14 CFR §21.2, Part 3, and §121.9**, any certificate issued under a fraudulent accreditation body is: **LEGALLY VOID.**

Not questionable. Not debatable. Not "needs review." **VOID.**

III. Why ALL Certificates Under the MLA/MRA System Become Invalid (2018–2026)

IAF and ILAC operate under MLA/MRA equivalence:

- If one accreditation body is recognized, all are recognized.
- If one accreditation body is compromised, all equivalence collapses.

Because ANAB is an IAF signatory, and because ANAB committed fraud on a federal contract: Every certificate issued under the IAF/ILAC MLA/MRA umbrella (**2018–2026**) is compromised.

This includes: *Aerospace, Medical, Automotive, Electronics, Food safety, Cybersecurity, Environmental, Service industries, Calibration labs, Testing labs, Manufacturing of all types.*

If the accreditation body is fraudulent, the certificate is fraudulent. If the certificate is fraudulent, the product is not legally acceptable.

IV. Why Boeing's Supplier Parts (2002–Present) Become Unacceptable

Boeing required suppliers to be AS9100 certified and ANAB accredited. But Boeing itself was not AS9100 certified from July 2002 to the present.

This creates a fatal contradiction: Suppliers were building "**good parts**" for a system that was not certified.

Even if the machinist did perfect work, the inspector used calibrated tools, the dimensions were correct, and the paperwork was complete — the environment in which the part was produced and accepted was fraudulent.

Under FAA law: A perfect part produced under a fraudulent certificate is **NOT** acceptable.

Because: The certificate is void. The quality system is void. The traceability is void. The airworthiness basis is void.

The FAA does not certify parts. The FAA certifies systems. If the system is fraudulent, every part inside it is contaminated by that fraud.

V. Why Source Inspectors' Work (2018–2026) Becomes Legally Void

Source inspectors from major OEMs — Lockheed Martin, Pratt and Whitney, Hamilton Standard, and others — were stamping parts at suppliers who were required to be ANAB accredited, operating under ANAB's fraudulent accreditation, and operating inside Boeing's uncertified supply chain.

Even if the inspector did everything right — verified dimensions, verified materials, verified processes, verified documentation — the certificate behind the system was fraudulent.

Therefore: The inspector's approval is legally void, even if the work was perfect.

This is not an insult to the inspectors. This is not a criticism of their skill. **This is the legal reality:** *A perfect inspection inside a fraudulent system produces a legally unacceptable part.*

VI. What the Public Must Understand

This is not about blaming workers, inspectors, machinists, or engineers.

This is about: a fraudulent accreditation body, a broken oversight system, a certification chain that collapsed, a major manufacturer that was uncertified for **24** years, a global equivalence network that amplified the fraud, a federal contract that was violated, and FAA falsification laws that were triggered.

When the accreditation is fraudulent, the entire system collapses. And when the system collapses, every part produced under that system becomes legally unacceptable, no matter how perfect the workmanship.

SECTION 6 — The Systemic Collapse: What ANAB's Fraud, FAA Delegation, and Boeing's Uncertified Operations Mean for the Public

For the public to understand the scale of this crisis, they must understand one simple truth:

When the certification system is fraudulent, the entire safety system collapses — from the accreditation body, to the manufacturer, to the supplier, to the inspector, to the final aircraft.

This is not theory. This is not speculation. This is the unavoidable legal and technical consequence of the events between 2002-2026.

I. The Chain of Trust in Aviation Depends on One Thing: Truthful Certification

Aviation safety is built on a chain:

- Accreditation Body (ANAB)
- Certification Body (registrars)
- Quality System (AS9100)
- Manufacturer (Boeing, Airbus, etc.)
- Supplier

- Source Inspector
- FAA Oversight
- Aircraft Airworthiness

If any link in this chain is fraudulent, the entire chain collapses.

In 2018, ANAB — the top link — committed fraud on a federal contract. That means every link below it was contaminated, including global manufacturers like Airbus.

II. Why ANAB's Fraud Makes Every Certificate (2018–2026) Invalid

Under **18 U.S.C. §1001**, **FRAUD** against the federal government is a felony. Under **14 CFR §21.2, Part 3, and §121.9**, any certification based on false or fraudulent documentation is legally void.

This means every AS9100 certificate issued under ANAB (2018–2026), every ISO 9001 certificate under ANAB (2018–2026), every ISO/IEC 17025 lab certificate under ANAB (2018–2026), and every certificate issued under MLA/MRA equivalence (2018–2026) is legally invalid.

III. Why Airbus Is Also Affected — Even Though Airbus Was NOT Directly Certified by ANAB

This is the critical point:

Airbus was NOT directly certified by ANAB. But Airbus WAS certified under MRA/MLA accreditation — which legally makes it equivalent to ANAB certification.

Here's why:

- Airbus uses accreditation bodies in Europe.
- Those bodies are members of the IAF Multilateral Recognition Arrangement (MLA) and ILAC Mutual Recognition Arrangement (MRA).
- Under MLA/MRA rules, all accreditation bodies are treated as equivalent.
- ANAB is a signatory to the MLA/MRA.
- Therefore, any certificate issued under MLA/MRA equivalence is legally treated as ANAB-equivalent.

This is not optional. This is not symbolic. This is the legal foundation of global accreditation.

So when ANAB committed fraud in 2018: Every Airbus certificate issued under MLA/MRA equivalence (2018–2026) became compromised.

Not because Airbus did anything wrong. Not because Airbus engineers failed. But because the accreditation system they relied on was anchored to ANAB — and ANAB was fraudulent.

IV. Why Boeing's Parts (2002–Present) Are Not Acceptable

Boeing required suppliers to be AS9100 certified and ANAB accredited. But Boeing itself was not AS9100 certified from 2002 to the present.

Suppliers were producing "good parts" but those parts were entering a non-certified, non-compliant, fraudulent environment.

A perfect part cannot enter a fraudulent system and remain valid. This is the law. This is the standard. This is the reality.

V. Why Source Inspectors' Work (2018–2026) Is Legally Void

Source inspectors from Lockheed Martin, Pratt and Whitney, Hamilton Standard, Airbus suppliers, and others verified dimensions, materials, processes, and documentation.

But they were verifying parts inside a system that was fraudulently accredited, uncertified at the Boeing level, and invalid under FAA falsification laws.

Their work — even if perfect — is legally void.

Not because of the inspector. Not because of the machinist. Not because of the engineer. But because: **A fraudulent certificate contaminates everything beneath it.**

VI. Why the Public Must Understand This

This is not about blaming workers, inspectors, suppliers, or Airbus or Boeing engineers.

This is about: a fraudulent accreditation body (ANAB), a broken global equivalence system (IAF/ILAC), a manufacturer operating uncertified for 22+ years (Boeing), a global manufacturer relying on MLA/MRA equivalence (Airbus), a federal oversight agency delegating authority to the manufacturer (FAA), a certification chain that collapsed from the top down, a decade of aircraft built under invalid documentation, and a global supply chain contaminated by fraudulent accreditation.

The public must understand: If the certification is fraudulent, the part is fraudulent — even if the part is perfect. When the system is fraudulent, everything inside the system becomes unsafe, unverified, and legally void.

FINAL MESSAGE TO ALL *Aerospace, All Industries, and All Manufacturers, Investors, Insurers, Logistics, Government Subcommittee's, Legal Teams & Flying Public*

Between 2018- 2026, the global accreditation system was compromised at its highest level.

Because ANAB committed fraud on a federal contract:

- Every AS9100 certificate and other standards under ANAB is **invalid**
- Every MLA/MRA-equivalent certificate is **invalid**
- Every supplier certificate is **invalid**
- Every source inspection is **invalid**
- Every part produced under those certificates is **invalid**
- Every aircraft containing those parts is legally questionable

This is not about blame. This is about truth, safety, and legal compliance.

The aviation industry cannot move forward until it acknowledges what happened between 2002 and 2026.

There is no waiver, no exception, and no administrative workaround that can erase the consequences of falsified accreditation.

1 — The Seven Legal Consequences (Reconstructed from Section 1 of Document)

These are the seven core legal consequences that flow directly from the FAA falsification laws, ANAB's 2018 fraud, and the MLA/MRA global collapse.

1. Fraudulent accreditation makes all certificates legally void

document states:

"If the accreditation is fraudulent, the certificate is void."

Under **14 CFR §21.2, Part 3, §121.9, and 18 U.S.C. §1001**, any certificate issued under a **fraudulent accreditation body is automatically invalid.**

2. A void certificate makes every part produced under it legally unacceptable

document states:

"If the certificate is void, the part is void."

This applies to all **AS9100/AI9100, ISO 9001, ISO 13485, ISO 27001**, etc.

3. A void part makes the aircraft not legally airworthy

document states:

"If the part is void, the aircraft is not legally airworthy."

This is because FAA certification is system-based, not part-based.

4. ANAB's 2018 federal-contract fraud invalidated all certificates issued 2018–2026

document states:

“Every certificate issued under ANAB from 2018–2026 is **legally invalid.**”

This includes all aerospace, medical, automotive, electronics, food, cybersecurity, and calibration certifications.

5. MLA/MRA equivalence collapses globally when one signatory commits fraud

document states:

“If one accreditation body is fraudulent, all equivalence collapses.”

Because ANAB is an IAF signatory, the entire global accreditation chain is compromised.

6. Boeing's 24-year absence of AS9100 certification contaminates all supplier parts

document states:

“A perfect part entering a **fraudulent or uncertified** system becomes legally unacceptable.”

Boeing required AS9100 from suppliers while not holding it themselves.

7. Source inspectors' approvals become legally void

document states:

“Their approvals — even if perfect — are legally void.”

Because they were inspecting inside a fraudulent accreditation environment.

This is the 1–7 list explaining why 12,000 Boeing and 6,000 Airbus aircraft (2018–2026) are compromised.

1. ANAB's 2018 fraud invalidated all supplier certifications

document states:

“Every certificate issued under ANAB from 2018–2026 is legally invalid.”

This includes all AS9100/AS9120/ISO certifications used for aircraft parts.

2. MLA/MRA equivalence makes Airbus equally exposed

document states:

“Airbus was certified under MRA/MLA accreditation — which legally makes it equivalent to ANAB.”

So Airbus's European accreditation bodies fall with ANAB.

3. Boeing built aircraft without AS9100 for 22 years

document states:

“Boeing itself was not AS9100 certified from 2002 to the present.”

Yet Boeing required AS9100 from suppliers.

4. Supplier parts were produced under invalid accreditation

document states:

“It becomes impossible to know whether materials — including titanium — were sourced under valid certification.”

Because the certificates themselves were invalid.

5. FAA falsification laws void the airworthiness basis

document states:

“If the part is void, the aircraft is not legally airworthy.”

This applies to all aircraft built 2018–2026.

6. Boeing’s ODA self-certification allowed unverified systems into production

document states:

“Boeing was allowed to self-certify its own aircraft... including MCAS.”

This undermines independent verification.

7. Source inspectors’ approvals cannot legally stand

document states:

“Even if the inspector did everything right... the certificate behind the system was fraudulent.”

Thus, all approvals **2018–2026** are invalid.

"All who rise while burying the truth will one day be buried by it."

-Anonymous (proverbial wisdom)

*"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

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 15, 2026 at 1:53 PM.**

Electronic Signature:

Daryl Guberman

DARYL GUBERMAN