

GUBERMAN-DISCOVERY



**WHY BOEING NEVER ACHIEVED AS9100
WHICH CHANGED TO AI 9100 JANUARY 2026**



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THE GUBERMAN DISCOVERY

A Forensic Report on Boeing's 24-Year Absence of AS9100 Certification and the Collapse of Aerospace Accreditation Oversight (2002–Present)

This **GUBERMAN DISCOVERY** demonstrates that Boeing operated outside the required aerospace quality system for 24 years. Without AS9100, Boeing lacked the foundational controls necessary to legally and safely produce aircraft. The evidence indicates Boeing should not have been manufacturing commercial or military platforms under federal law.

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Executive Summary

This report reconstructs a 24-year systemic failure in aerospace quality governance. Following the events of September 11, 2001, Boeing initiated mass layoffs and simultaneously issued supplier mandates requiring AS9100 and NADCAP National Aerospace and Defense Contractors Accreditation Program, certifications — standards Boeing itself never held from 2002 to Present.

During this period, Boeing expanded its authority within the FAA through the Organization Designation Authorization (ODA) system, gained influence over accreditation bodies, and operated without third-party oversight while producing more than 12,000 commercial aircraft and over 400 military platforms.

The **GUBERMAN DISCOVERY** concludes that Boeing intentionally avoided AS9100 certification to prevent production slowdowns caused by internal audits, management reviews, and required inspections. This decision created a closed loop of self-validation, undermining regulatory integrity and public safety.

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1. Introduction

In the aftermath of 9/11, Boeing faced severe operational instability. Between April and July 2002, the company prepared to lay off 20,000–30,000 employees. To maintain production continuity, Boeing issued supplier bulletins that quietly restructured aerospace oversight.

These bulletins — combined with accreditation body name changes, database enforcement, and FAA delegation — formed the foundation of a 24-year oversight collapse.

This report documents the timeline, evidence, and forensic analysis that led to the **GUBERMAN DISCOVERY**.

2. Phase I — Supplier Mandates (2002–2004)

2.1 April 2002: NADCAP Mandates

Boeing issued supplier bulletins requiring special process heat treatment—welding, non-destructive testing — to be certified under NADCAP, operated by the Performance Review Institute (PRI). What Boeing stated in this bulletin is basically send in your

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certification, send in your parts and ***if need be*** Boeing will come onsite to their supplier.

2.2 July 2002: ANAB-Accredited Certification Requirement

Boeing required suppliers to hold AS9100 accredited ANAB American National Accreditation Board-accredited certifications or “internationally equivalent” credentials. What Boeing stated in this bulletin is basically send in your certification, send in your parts and **if need arises** Boeing will come onsite to their supplier.

- By 2018, those “**equivalent**” bodies (**MRA**-Multiregional Arrangement & **MLA**-Multilateral Arrangement) were exposed as defunct under a U.S. Department of State-DOS contract **19AQMM18R0131 (2018)**
- Boeing’s **July 2002** Supplier Bulletin listed registrars as **ANSI-RAB-NAP** - American National Standards Institute Register Accreditation Board National Accreditation Program, **renamed ANSI-ASQ-NAB-ANAB** (American National Standards Institute-American Society for Quality- National Accreditation Board-American National Accreditation Board) - in **2004**. **Renamed**

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ANSI-ANAB in **2014** & In **December 2018** notification announced ANSI to take over 100% control of ANAB while ASQ sells ownership 3 months after the September DOS contract which illustrated ANAB as an underwriter which an accreditation body can not be.

2.3 2014: Structural Collapse

ANSI-ASQ-NAB-ANAB was consolidated **2014** into ANSI-ANAB, effectively dissolving the prior oversight framework.

3. Phase II — Database Enforcement & Boeing's Expanding Authority (2003-2012)

3.1 2003: ANAB Heads-Up 22

ANAB mandated that all AS9100 suppliers register in the OASIS database.

- Non-participation or website fees risked certificate withdrawal.
- Boeing controlled approximately **65%** of OASIS operations.

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3.2 2005–2009: ODA Expansion

Under the FAA’s Organization Designation Authorization (ODA):

- Boeing employees acted as FAA inspectors.
- Boeing gained authority to self-certify aircraft and technologies.
- Regulatory boundaries blurred, culminating in the MCAS failures that caused **346** deaths in **2018–2019**.

4. Phase III — FAA Integration & Accreditation Conflicts (2012–2019)

4.1 2012: IAQG Recognition Memo

Tim Lee, IAQG-International Aerospace Quality Group- Chairman, issued a memo recognizing accredited AS9100/9110/9120 certificates and warning against unaccredited entries.

Yet Boeing itself held **no** AS9100 certification from **2002–2019**

4.2 2018: ANAB Misrepresentation

ANAB falsely claimed *underwriter* status on a U.S. Department of State contract, perpetuating fraudulent accreditation.

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DOS Contract 19AQMM18R0131 (2018)

This misrepresentation invalidated ANAB's claimed authority and **compromised** every certificate issued under its accreditation.

4.3 FAA Regulatory Violations

Under U.S. Federal Aviation Administration regulations:

14 CFR §21.2 — Applicability

Requires all aircraft and components to be produced under valid, traceable certification systems.

A fraudulent accreditation chain voids the legal basis for airworthiness documentation.

14 CFR Part 3 — General Requirements

Mandates accurate documentation, verifiable oversight, and integrity of the quality system. Certificates derived from fraudulent accreditation are legally invalid.

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14 CFR §21.9 — Production Approvals

Requires properly accredited quality systems and authentic certification authority. ANAB's misrepresentation under the DOS contract renders downstream certifications non-compliant.

14 CFR Part 5 — Safety Management Systems

Boeing's lack of AS9100 certification violates SMS requirements for hazard identification, corrective action, and continuous monitoring.

THE FAA–BOEING “BILL OF GOODS” DECEPTION

For more than **two decades**, Boeing and FAA representatives promoted a false narrative to suppliers, federal agencies, and outsourced inspectors:

“All you need is an FAA airworthiness certificate — AS9100 is optional.”

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This was a structural lie.

An FAA airworthiness certificate evaluates only the final aircraft,
not:

- supplier quality systems
- process controls
- documentation integrity
- traceability
- management oversight
- internal audits
- conformity to AS9100

The FAA certificate cannot replace AS9100 because:

- AS9100 governs the system
- Airworthiness governs the end product

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If the system is fraudulent, the product is fraudulent — even if the FAA signs off

This deception misled:

- federal agencies
- outsourced inspectors
- suppliers
- international regulators
- the global aerospace supply chain

And it directly fed the **24**-year collapse documented in the **GUBERMAN DISCOVERY**.

5. Phase IV — Exposure & Field Investigation (2024–2026)

5.1 April 17, 2024

Daryl Guberman presented to DHS Subcommittee under penalty of ejection or arrest, documentation showing Boeing had abandoned on-site supplier auditing for **22** years — now **24** years as of 2026.

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5.2 June 18, 2024

Meeting with Boeing CEO David Calhoun regarding the Alaska Airlines Flight 1282 door-plug failure. Guberman was there and hearing a mother of a victim from either the Ethiopian or Indonesian air screaming at Calhoun “***You killed my daughter you killed my family.***”

5.3 June 27, 2024

Boeing VP of Quality Elizabeth Lund stated Boeing was “***willing and prepared*** to obtain AS9100 certification.” **Compliant** to AS9100 and Boeing was conducting internal audits “***as if certified to AS9100.***”

5.4 October 2024: Field Investigation-By Daryl Guberman

Visits to Everett, Renton, Auburn, and Northfield revealed:

- Employees unaware of AS9100 requirements.
- No internal audit procedures.
- Missing documentation in aircraft archives.

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- Supervisors forbidding attendance at safety meetings to avoid production delays.

This was the time Daryl Guberman homogenize the July 2002 Supplier Bulletin and the supervisors not allowing employees to go to meetings. **THE GUBERMAN-DISCOVERY**

STAGE 5 — THE 2009 SELF-CERTIFICATION FAILURE

The FAA's **2009** ODA Organization Designation Authorization structure gave Boeing FAA authority to self-certify their own aircraft, aircraft technologies and aircraft designs. Boeing employees, paid by Boeing, to act as FAA designees: This in essence meant Boeing CEO was an administrator for FAA but worked at Boeing.

- They approved systems such as MCAS
- They operated without AS9100 internal controls. 24 years.
- They had no independent FAA oversight.
- Boeing effectively became both manufacturer and regulator.

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In 2019, after 346 deaths, an FAA spokesperson stated:

“The FAA does not allow companies to police themselves or self-certify their own aircraft.”

This contradicted a decade of FAA-delegated Boeing self-certification.

This contradiction is a core pillar of the

GUBERMAN DISCOVERY.

THE GUBERMAN DISCOVERY — FEDERAL OVERSIGHT COLLAPSE & THE AIRWORTHINESS DECEPTION

The **GUBERMAN DISCOVERY** identifies not only Boeing’s internal abandonment of AS9100, but the collapse of federal oversight that enabled it. This was inclusive of the July 2002 supplier bulletin and the onsite October 2024 information concerning supervision **not** allowing employees to attend meetings.

The GUBERMAN-DISCOVERY began.

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For 24 years, the U.S. Government — through FAA, DHS, DOJ, Commerce, FDA, and NIST — operated under a false assumption: These federal agencies were members and some were even paying customers.

That FAA airworthiness certification superseded AS9100.

This fallacy was reinforced by:

- FAA delegation (ODA)
- ANAB's fraudulent accreditation identity
- **DOS Contract 19AQMM18R0131**
- **DOJ Contract 15F06725C0000139**
- Federal officials receiving supplemental payments from ANSI/ANAB
- Boeing's seat (**2014-2024**) on ANAB's **Management System Accreditation Committee-MSAC** they could *grant, suspend and withdraw certification.*

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- The defunct ANSI-ASQ-NAB-ANAB entity still appearing on Boeing's supplier portal for **12** years still up May 6 2026 4:11pm
- Misleading guidance to outsourced inspectors
- Misleading guidance to suppliers
- Misleading guidance to federal agencies

Federal Salary Conflicts

- **Philip Mattson (DHS) received \$262,000 from ANSI while holding a federal salary. Member & Customer of ANSI-ANAB**
- **Gordon Gillerman (NIST/Commerce) received over \$120,000 in additional payments. Member & Customer of ANSI-ANAB**

These conflicts created a regulatory blind spot where:

- oversight was compromised
- accreditation was assumed valid
- Boeing operated uncertified
- ANAB operated fraudulently

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- federal agencies relied on invalid accreditation
- national security was breached

National Security Breach

From **2015–2021**, IAF oversight was led by Xiao Jianhua, a Communist Chinese national and CEO of CNAS China National Accreditation Services- Beijing. He assumed leadership of the International Accreditation Forum and had ties to U.S. quality systems since **1994**. Given that ANSI-ANAB was instrumental in the founding of the IAF International Accreditation Forum – (incorporated in Delaware) with federal agencies and corporations as members, Xiao could have transmitted information to China, as required by China's Intelligence Law, Article 7, mandating informational retrieval for the state.

In **January 2017**, Xiao Jianhua issued a laboratory certification to an under prepared Wuhan lab. Within six months, U.S. specialists noted that staff lacked highly trained technicians. Complaints persisted into May 2019, when a CDC training document for virology labs globally mentioned only the Wuhan lab. Around the same time, Pamela Sale (ANSI-ANAB VP, Laboratory

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Accreditation) stated in deposition:

"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."

Without formal protocols in the U.S., the lack of oversight for China and global labs represents a severe public health and safety risk.

The DOS contract opened the door.

This is not merely an aerospace failure.

It is a federal oversight collapse — a core component of the **GUBERMAN DISCOVERY**.

6. The GUBERMAN DISCOVERY (Formed May 6, 2026)

Boeing avoided AS9100 certification **intentionally** — not accidentally.

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This represents complete internal collapse both in the US & Internationally in every industry that requires ISO certification or its derivatives, accredited by ANSI-ANAB or its MRA-MLA equivalents.

JANUARY 2026 - GLOBAL ACCREDITATION

RESTRUCTURING

IAF (Delaware) and ILAC (Australia) will merge into GLOBAC, and AS9100 will transition to AI9100. No merger can erase Boeing's 24-year uncertified production history.

CONCLUSION - THE FULL FUNNEL SNAP

Across 24 years, the evidence reveals:

- False assumptions of compliance.
- An accreditation structure governed by an uncertified Boeing.
- Federal conflicts of interest undermining oversight.
- A global supply chain built on non-existent foundations.
- International lab and public health risks due to lack of standardized protocols.

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EXHIBIT A-D

EXHIBIT A — "THE BOEING–AIRBUS ACCREDITATION COLLAPSE: 2002–PRESENT"

A comprehensive forensic report documenting Boeing's twenty-four-year non-certification gap, the ANAB entity designation fraud, the systemic failure of aerospace quality accreditation under the AS9100/AS9110/AS9120 standards, and the material impact on corporate financial disclosures and executive compensation. <https://guberman-quality.com/wp-content/uploads/2026/04/ACCREDITATION-COLLAPSE-2002-PRESENT-BOEING-AIRBUS.pdf>

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EXHIBIT B — "EXPOSING MEDICAL DEVICE DECEPTION AND REGULATORY EROSION: 2018–PRESENT"

A forensic report documenting the extension of the **GUBERMAN Anomaly-Discovery** into the medical-device sector, demonstrating that the accreditation failure is a systemic contagion affecting ISO 13485 certifications, FDA regulatory reliance, and the safety and integrity of life-critical medical products. DME Durable Medical Equipment, Medical Implants, Medications Worldwide is effected. The FDA sits on ANSI-ANAB as a member and customer. <https://guberman-quality.com/wp-content/uploads/2026/04/EXPOSING-MEDICAL-DEVICE-DECEPTION-REGULATORY-EROSION-2018-Present.pdf.pdf>

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EXHIBIT C — "THE GUBERMAN ANOMALY DISCOVERY — FEBRUARY 2026"

The foundational forensic document establishing the cascading accreditation-hierarchy failure, the dissolution of the ANSI-ASQ joint venture, and the systemic implications for all ISO-based certification frameworks across aerospace, medical devices, manufacturing, and defense. <https://guberman-quality.com/wp-content/uploads/2026/03/GUBERMAN-ANOMALY-FEBRUARY-2026.docx.pdf>

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EXHIBIT D — "THE INDUSTRIAL & MANUFACTURING ACCREDITATION FAILURE: 2018–PRESENT"

A forensic report documenting the spread of the **GUBERMAN Anomaly-Discovery** into the industrial, manufacturing, construction, energy, and infrastructure sectors. This exhibit establishes that the accreditation identity collapse—triggered by the dissolution of the ANSI–ASQ National Accreditation Board joint venture and the 2018 ANAB designation failure—compromised ISO 9001, ISO 14001, ISO 45001, and related industrial certifications. The report demonstrates that manufacturers, fabricators, utilities, and critical-infrastructure suppliers have been operating under accreditation language that no longer matched the published requirements, resulting in systemic misrepresentation across supply chains, procurement systems, and federal/state contracting disclosures. Also effecting Worldwide Accreditation's <https://guberman-quality.com/wp-content/uploads/2026/04/2026-INDUSTRIAL-BOOKLET.pdf>

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This is the **largest** quality-assurance (INDUSTRIAL-FIDUCIARY) failure in aerospace history - global, systemic, and decades deep. **EXPOSED BY 40 YEAR QUALITY EXPERT 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 **MAY 6, 2026 at 1:43 PM.**

Electronic Signature:



DARYL GUBERMAN

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