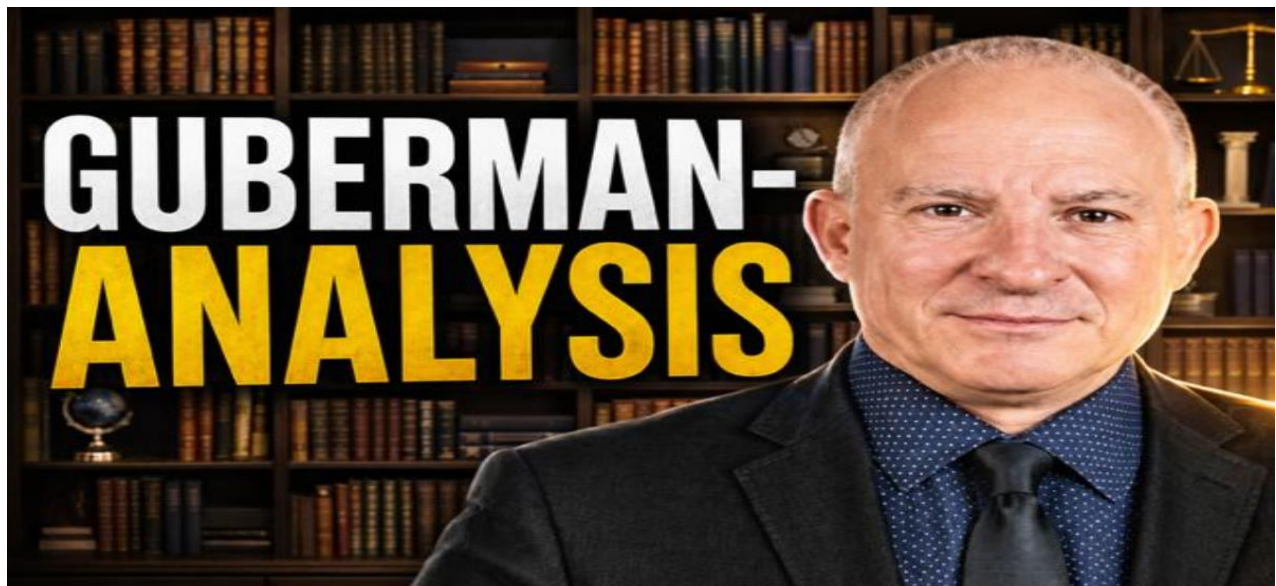


# **SUBMISSION TO THE DIRECTORATE GENERAL OF CIVIL AVIATION (DGCA), GOVERNMENT OF INDIA**

## **THE GUBERMAN ANALYSIS OF THE JUNE 12, 2025 AIR INDIA 787 CRASH**



### **A Forensic Reconstruction of Boeing's 24-Year Certification Collapse and the Systemic Failure Underlying the Accident**

Submitted by:

Daryl Guberman

CEO, Guberman PMC LLC

40+ Year Quality-Systems Expert

Forensic Accreditation Investigator

**Primary Source:** The Guberman Discovery

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(Contains all supporting documents, supplier bulletins, accreditation records, and federal-contract evidence.)

## **1. PURPOSE OF THIS SUBMISSION**

This submission is provided to the Directorate General of Civil Aviation (DGCA) to present a forensic, evidence-based analysis of the June 12, 2025 Air India Boeing 787 crash.

The analysis demonstrates that the root cause of the accident is not pilot error, not a toggle-switch malfunction, and not an isolated component failure, but a system-level collapse in Boeing's manufacturing, accreditation, and oversight structure.

This collapse originated between 2001 and 2003, was amplified by FAA actions in 2009, and was globally contaminated by ANAB's misconduct in 2018, affecting all MRA-MLA signatories.

## **2. AIRCRAFT MANUFACTURE AND CERTIFICATION TIMELINE**

- Final Assembly Completed: April 2014
- Delivered to Air India: June 2014
- Certification Basis: Boeing ODA (post-2009 FAA self-certification authority)
- Years in Service at Time of Crash: 11 years
- Quality System in Effect: Boeing non-AS9100, ANAB-dependent, MRA-MLA-contaminated chain

This aircraft was built entirely within a non-certified, structurally compromised quality system.

## **3. CHRONOLOGY OF SYSTEMIC FAILURE**

### **3.1 Post-9/11 Workforce Reduction (2001–2002)**

Boeing eliminated 20,000–30,000 employees, including internal quality personnel, weakening oversight capacity.

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### **3.2 APRIL 2002 — Mandatory NADCAP Accreditation for Heat Treat, Welding, NDT, and Special Processes**

**In April 2002, Boeing issued a supplier bulletin requiring mandatory NADCAP accreditation for:**

- Heat Treatment
- Welding
- Non-Destructive Testing (NDT)
- Other Special Processes

**The bulletin stated:**

*“Suppliers must obtain NADCAP accreditation or be removed from Boeing’s approved process list.”*

**And:**

*“Boeing will augment NADCAP audits with additional assessments as the need arises.”*

**This bulletin:**

- Forced suppliers into PRI/NADCAP control
- Allowed Boeing to avoid direct oversight
- Marked the beginning of Boeing’s withdrawal from internal quality responsibility

This April 2002 mandate is the first structural break in Boeing’s quality system.

### **3.3 JULY 2002 — AS9100 Mandate and Boeing’s Withdrawal from Supplier Audits**

- AS9100 certified
- Accredited by ANAB or an international equivalent

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## **Boeing stated:**

*“Our preference is to deal with proven suppliers... and not have to do on-site quality system surveys/audits.”*

This sentence authorized Boeing to stop auditing suppliers entirely.

Boeing forced AS9100 on suppliers while refusing to obtain AS9100 itself.

### **3.4 2003 — ANSI-ANAB and IAQG OASIS Centralization**

ANSI-ANAB issued “Heads-Up 22,” mandating all AS9100-certified companies be placed in the OASIS database.

Refusal meant certificate revocation.

This centralized global aerospace certification under IAQG and ANAB.

### **3.5 2009 — FAA Expands Boeing’s ODA Self-Certification Authority**

In 2009, the FAA expanded Boeing’s Organization Designation Authorization (ODA) to an unprecedented level. Under this expansion, Boeing was permitted to:

- Employ full-time Boeing–FAA Inspectors who carried FAA authority but were paid directly by Boeing
- Approve their own engineering findings
- Approve their own conformity inspections
- Approve their own airworthiness determinations
- Control the certification pathway internally without independent oversight

These inspectors were FAA in title, but Boeing in paycheck, Boeing in supervision, Boeing in evaluation, and Boeing in command structure.

### **The Structural Consequence**

## **Because these Boeing–FAA Inspectors were:**

- Hired by Boeing
- Paid by Boeing
- Managed by Boeing
- Directed by Boeing
- Evaluated by Boeing

yet exercised FAA regulatory authority, the FAA’s certification power effectively flowed through Boeing’s corporate hierarchy.

## **The Critical Reality**

In essence, having full-time Boeing–FAA Inspectors paid by Boeing made the CEO of Boeing the functional Administrator of the FAA — because the FAA’s delegated authority was executed by Boeing employees under Boeing’s payroll and Boeing’s internal command structure.

## **Why This Matters**

### **This arrangement meant:**

- Boeing approved Boeing
- Boeing oversaw Boeing
- Boeing certified Boeing
- Boeing validated Boeing
- Boeing issued the equivalent of FAA approvals through its own employees

### **This is the regulatory inversion that allowed:**

- MCAS to be self-approved
- Supplier oversight to collapse
- Process-control failures to go undetected
- Airworthiness determinations to be issued without AS9100 system compliance

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**And it directly contributed to the systemic conditions that produced the **June 12, 2025 Air India 787 crash.****

### **3.6 2012 — Boeing Influence Inside Accreditation Committees**

A Boeing employee who simultaneously served on the ANAB Management Systems Accreditation Committee (2014-2024)—the body empowered to ***grant, suspend, and withdraw accredited certifications***—and who also held the influential position of Chairman of the International Aerospace Quality Group (IAQG), issued a bulletin in July 2013 to ten accreditation organizations, including ANAB and its MRA/MLA-equivalent international partners.

This bulletin instructed these bodies to “maintain vigilance” regarding unaccredited certificates entering the accredited certification ecosystem.

However, at the time this directive was issued, Boeing itself was not certified to the AS9100 standard, making the warning inherently contradictory. The situation represents a misnomer of authority, in which an uncertified organization—through its representative who held dual positions of influence—directed fully accredited bodies on certificate integrity while lacking the very certification required to substantiate such guidance.

### **3.7 2014 — ANAB Vice President Confirms Global Equivalence**

**ANAB’s Vice President of Quality & Chairman & Principal in ANSI-990 tax report wrote:**

- All MRA-MLA signatories must accept each other’s certificates as equivalent
- CNAS (China) and ANAB (USA) were interchangeable as were all MRA-MLA equivalents. This included, UKAS England, ACCREDIA-Italy, DAKKS-Germany etc.

“IAF MLA signatories are obligated to recognize certificates accredited by other signatories as equivalent.” The motto was “ Certified Once Accepted Everywhere”

Thus, any ANAB impropriety (claimed **underwriter** 2018 DOS contract) contaminated the entire global chain.

IAF & ILAC merged in January 2026 into GLOBAC Global Accreditation Cooperation / also AS9100 became AI9100 during January 2026 with a 3 year grace period in order to implement system.

### **3.8 2018 — ANAB and the Falsified Federal Contract**

On September 4, 2018, the Department of State signed Contract No. **19AQMM18R0131**.

ANAB’s involvement as **“underwriter”** constituted fraud, contaminating all MRA-MLA-linked certifications Worldwide.

### **3.9 2024 — The Guberman Discovery**

**The discovery established:**

- Boeing avoided AS9100 intentionally
- AS9100 would have required internal auditors
- Boeing chose speed and cost savings over compliance
- The entire system from 2002–2025 was built on non-certified foundations

## **4. WHY AIRWORTHINESS DOES NOT AND CANNOT SUPERSEDE AS9100**

Organizations such as the FAA, EASA, and ICOP have promoted the false doctrine that:

**“Airworthiness certification supersedes AS9100.”**

This is technically impossible.

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Airworthiness is a final snapshot.  
AS9100 is the system that creates the aircraft.

**Airworthiness does not evaluate:**

- Heat treat controls
- Composite layup integrity
- Anodize/prime adhesion
- Calibration systems
- Supplier qualification
- Metallurgical pedigree
- Mechanical testing regimes

**AS9100 does.**

A final inspection cannot validate a broken manufacturing system.

**5. HISTORICAL PROOF OF SYSTEM FAILURE**

- Ethiopian Airlines 302 (2019) — system failure
- Lion Air 610 (2018) — system failure
- C-46 program — system failure
- Air Force One (VC-25B) — system failure
- Qatari head-of-state aircraft — system failure

The June 12, 2025 Air India crash follows the same pattern.

**6. SUPPORTING EXHIBITS**

Exhibit 1 — The Guberman Discovery (Comprehensive Forensic Record)

**Exhibit 1 consists of the complete Guberman Discovery, including:**

<https://guberman-quality.com/wp-content/uploads/2026/05/GUBERMAN-DISCOVERY-2026.pdf>

1. The GUBERMAN Anomaly Discovery (February 2026)
2. The Boeing & Airbus Collapse (2002–Present)
3. The Industrial Collapse (2018–Present)
4. The Medical Collapse (2018–Present)

These four components form the foundational forensic evidence supporting this DGCA submission.

## **Exhibit 2 — FAA Docket Submission (FAA-2019-0482-0075)**

This exhibit includes the official FAA public docket submission:

**FAA-2019-0482-0075:** <https://www.regulations.gov/comment/FAA-2026-3879-0003>

Comment from Daryl Guberman — Posted May 5, 2020

This federally recorded document demonstrates that the systemic failures outlined in Exhibit 1 were formally brought to the attention of U.S. regulators years before the June 12, 2025 Air India crash.

We have submitted 13 Inspector General complaints 11 out of 13 are members of ANSI-ANAB and 5 of those are paying customers for services.

## **7. FINAL CONCLUSION FOR DGCA**

**The June 12, 2025 Air India 787 crash cannot be attributed to:**

- Pilot error
- Toggle switch malfunction
  
- Component failure

**The root cause is system failure:**

- The system the aircraft was built in
- The system the components were received into
- The system the aircraft was tested in
- The system that issued its flight-worthiness approvals

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The aircraft was produced inside a non-certified, structurally compromised quality system, contaminated by ANAB's impropriety and Boeing's deliberate abandonment of AS9100.

## 9. FEDERAL AGENCIES FORMALLY NOTIFIED

The following agencies received documented evidence of accreditation collapse, invalid AS9100 oversight, and federal-contractor fraud:

- GAO (FraudNet)
- HOUSE COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY
- NASA OIG
- DOT OIG
- DOC OIG
- DOS OIG
- DHS OIG
- DOE OIG
- DOD OIG
- SEC
- FDA
- DOJ
- FAA

Several agencies are not only board members — they are paying customers of ANSI-ANAB, including **DHS, DOC, DOJ, FDA and DOS**.

American National Standards Institute, Incorporated  
and Related Entities



Consolidated Financial Statements  
(Together with Independent Auditors' Report)

For the Years Ended December 31, 2021 and 2020  
and  
Single Audit Reports and Schedule as Required by the  
Office of Management and Budget Uniform Guidance

For the Year Ended December 31, 2021

AMERICAN NATIONAL STANDARDS INSTITUTE, INCORPORATED  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE YEAR ENDED DECEMBER 31, 2021



Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal Assistance Listing Number	Pass-Through Entity Identifying Number	Federal Expenditures	Amounts Provided to Subrecipients
<b>U.S. Department of Commerce:</b> General Services for the International Organization for Standardization/ Electronic Commission Joint Technical Committee on Information Technology, Subcommittee 37 on Biometrics	11.609	6DNW602020	\$ 33,140	\$ -
Research Examining the Return on Investment (ROI) of Manufacturing Orderlines (Worked Contract)	11.609	7D4W604111	95,023	-
<b>Total U.S. Department of Commerce</b>			<b>128,163</b>	<b>-</b>
<b>U.S. Department of Agriculture:</b> Forest Service, Research and Development	10.662	25-06-1112060-330	9,075	-
<b>Total U.S. Department of Agriculture</b>			<b>9,075</b>	<b>-</b>
<b>U.S. Department of Homeland Security</b> Technology, Subcommittee 37 on Biometrics	97.986	7P5A71P93000016 7P5A72P93000011	25,335 13,288	-
<b>Total U.S. Department of Homeland Security</b>			<b>42,927</b>	<b>-</b>
<b>U.S. Department of Justice</b> Technology, Subcommittee 37 on Biometrics	16.960	2016-4-CH-012	37,283	-
<b>Total U.S. Department of Justice</b>			<b>37,283</b>	<b>-</b>
<b>U.S. Food and Drug Administration</b> For direct administration of the GDOTC 340C 9 Secretariat and for enhanced services to the GDOTC 340C 9	93.021 93.022	HHPF2202-650023A 7P5A72P93000011	63,490 17,762	-
<b>Total U.S. Food and Drug Administration</b>			<b>81,252</b>	<b>-</b>
<b>U.S. Trade and Development Agency</b> U.S.-China Standards and Conformity Program (UCTCA) U.S.-Africa Standards and Conformity Program (UAFCA) Africa ICT Standards Program UCTCA Indo-Pacific	98.003 98.004 98.005 98.006	1101R18CCP1024 1101R18CCP11023 1101R18CCP11107 1101R18CCP1027	116,570 66,880 252,363 62,057	-
<b>Total U.S. Trade and Development Agency</b>			<b>457,870</b>	<b>-</b>
<b>U.S. Agency for International Development</b> U.S. Agency for International Development - Standards Alliance Project (USAD) U.S. Agency for International Development - Standards Alliance Project Phase 3 (USAD3)	98.021 98.021	63-HSP2202111019C 7200AA19CA00212	959,903 1,363,992	-
<b>Total U.S. Agency for International Development</b>			<b>2,323,895</b>	<b>-</b>
<b>TOTAL FEDERAL AWARDS</b>			<b>\$ 2,417,968</b>	<b>\$ -</b>



AMERICAN NATIONAL STANDARDS INSTITUTE, INCORPORATED  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE YEAR ENDED DECEMBER 31, 2024



Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Entity Identifying Number	Federal Expenditures	Amounts Provided to Subrecipients
<b>Research and Development Cluster:</b> <b>U.S. Department of Commerce</b> Measurement and Engineering Research and Standards Secretariat Services for the International Organization for Standardization/ Electronic Commission Joint Technical Committee on Information Technology, Subcommittee 37 on Biometrics	11.609		\$ 53,944	\$ -
NIST PPP for USGNSS CET	11.609		159,640	-
<b>Total U.S. Department of Commerce</b>			<b>213,584</b>	<b>-</b>
<b>U.S. Department of Agriculture:</b> Forestry Research Forest Service, Research and Development	10.662		10,000	-
<b>Total U.S. Department of Agriculture</b>			<b>10,000</b>	<b>-</b>
<b>U.S. Department of Justice</b> National Institute of Justice Research, Evaluation, and Development Project Grants Technology, Subcommittee 37 on Biometrics			44,997	-
<b>Total U.S. Department of Justice</b>			<b>44,997</b>	<b>-</b>
<b>U.S. Department of State</b> Cyberspace and Digital Policy Global ICT and CET Standards program			60,896	-
<b>Total U.S. Department of State</b>			<b>60,896</b>	<b>-</b>
<b>U.S. Agency for International Development</b> USAID Foreign Assistance for Programs Overseas			516,109	290,332
<b>Total U.S. Agency for International Development</b>			<b>516,109</b>	<b>290,332</b>
<b>TOTAL FEDERAL AWARDS</b>			<b>\$ 845,586</b>	<b>\$ 290,332</b>

For the Year Ended December 31, 2024

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Please note: These agencies have been paying into an organization that in 2018 perpetrated a fraud on a DOS federal contract. As you can see the 2024 tax form illustrates the same federal agency DOS paying into ANSI-ANAB This dual role — regulator and customer — violates ISO/IEC 17011 **Accreditation Body Requirements**, destroys impartiality, and invalidates the entire accreditation chain.

## 10. THE “DAY ONE” INVALIDITY PROTOCOL

The root cause of the June 12, 2025 crash was not a mid-life mechanical failure, not a toggle switch, and not pilot error. It was a systemic rejection that occurred at the moment of manufacture.

### 1. Honeywell Switch Contamination

When the Honeywell toggle switch was installed in 2014, it entered a non-certified, structurally compromised quality system. Boeing had abandoned AS9100, severing the pedigree of every component received into the aircraft.

### 2. Automatic SUP Designation

Under FAA rules, any part received into a non-certified system becomes a Suspect Unapproved Part (SUP) at the moment of entry. This includes the switch.

### 3. Regulatory Inversion

After the 2009 FAA ODA expansion, Boeing effectively became its own regulator.

Boeing-paid inspectors exercised FAA authority.  
Boeing approved Boeing.  
Boeing certified Boeing.

This inversion invalidates the airworthiness chain.

## **CUTTING OFF THE “MAINTENANCE” DEFENSE**

The aircraft’s 11-year service life is irrelevant.

You cannot “maintain” an aircraft into safety if the system that built it was already collapsed.

This was not a maintenance issue.

This was a manufacturing system failure baked into the aircraft from Day One.

## **THE ICOP FAIRYTALE — AND THE GLOBAL COLLUSION CHAIN**

ICOP, FAA, EASA, Boeing, and Airbus have spent years promoting the fiction that:

**“Airworthiness supersedes AS9100.”**

This is a technical impossibility.

These organizations operate in tandem — same committees, same golf courses, same martinis, same revolving-door culture. Their alignment is not accidental. It is structural.

The result?

**A global oversight collapse disguised as “compliance.”**

## **GLOBAL CONTAMINATION THROUGH MRA-MLA**

Because ANAB’s 2018 federal-contract fraud misrepresented itself as an **“underwriter”** on U.S. Department of State Contract

**19AQMM18R0131** contaminated the entire MRA-MLA chain, every certificate tied to that chain — including those touching Boeing’s suppliers — is technically and legally void. This effects all industries worldwide.

This is not opinion.

This is accreditation law.

## 9. SWORN DECLARATION OF DARYL GUBERMAN

I, DARYL GUBERMAN, do hereby swear under penalty of perjury that the analysis herein is accurate, evidence-based, and derived from verifiable records.

It was not the toggle switch.  
It was not pilot error.  
It was the system.

This is the truth.  
This is the record.  
This is not an FAA, Boeing or Honeywell response, but a 40 Quality Professional.  
This is the Guberman Analysis.

*Daryl Guberman*

CEO, Guberman PMC LLC / Systemic-Risk Advisor | Forensic Archivist |  
40-Year Quality-Systems Expert | Boeing Shareholder

**DATE:** 5/28/2026

# EXHIBIT A-E

## 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>

## **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>

## **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>

## 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>

## **EXHIBIT E — "THE GUBERMAN-DISCOVERY" ACCREDITATION FAILURE: 2018–PRESENT"**

The GUBERMAN discovery exposes a systemic bypass of AS9100 certification at Boeing beginning in July 2002, asserting that the company intentionally avoided the standard to prevent audits and corrective actions from slowing production. This discovery directly challenges the public assertions of Elizabeth Lund, Boeing's Senior Vice President of Quality, who stated in a June 27, 2024, Reuters interview that Boeing was "willing and prepared to get AS9100," while claiming they were already "compliant to the standard" and were conducting "internal audits as if they were certified." However, field investigations in October 2024 revealed that factory-floor employees were unaware of these audits and were often barred from safety meetings by supervisors because "the airplane has to move to the next station." By pushing these rigorous compliance burdens onto suppliers while referencing the defunct ANSI-ASQ National Accreditation Board (ANAB) on its website, Boeing allegedly maintains a facade of oversight that prioritizes moving the aircraft between stations over the safety and quality cycles mandated by aerospace law.

<https://guberman-quality.com/wp-content/uploads/2026/05/GUBERMAN-DISCOVERY-2026.pdf>

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 **5/28/2026 at 4:54 PM.**

Electronic Signature:



DARYL GUBERMAN