

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DEAD AIR ARMAMENT, LLC d/b/a DEAD AIR SILENCERS,

Petitioner v.

JARVIS ARMS LLC d/b/a MISSION SILENCERS,

Patent Owner

Case: IPR2026-00013

U.S. Patent No. 12,018,906

DECLARATION OF JOHN SPURRIER
IN SUPPORT OF PRELIMINARY RESPONSE
UNDER SECTION 37 C.F.R. § 42.107

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PO Box 1450
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I. INTRODUCTION

1. I have been asked by Jarvis Arms LLC to take the role of expert witness in the case considering the continuation of the awarded U.S. Patent No. 12,018,906. Compensation for my time on this task was discussed at the beginning of my involvement in the project. But I have decided not to take monetary payment for my time, experience and knowledge, but focus solely on the protection of this previously granted patent.

2. I understand that fulfilling the requirements of an expert witness requires a specific or targeted secondary degree, along with direct experience on the topic of the patent; in this case defense and manufacturing of small arms suppression devices.

A. Background and Qualification

3. I graduated from the United States Military Academy at West Point, NY, with a Bachelor of Science degree in Engineering (1983). Given the immediate requirement of the service academy of beginning no less than six years of service as an officer in the Army, I did not have the opportunity to pursue an advanced degree at that time. I will come back later to very

briefly discuss my specific roles and assignments in my six years of service in the United States Army Infantry Corps.

4. With regard to the level of service I have with direct experience in the sound and signature suppression of small arms, I spent time as the Chief Executive Officer and Board Member of OSS Suppressors LLC. I began working as the CEO of OSS Suppressors in October 2015. I departed my employment in May 2021. During my 5 ½ years in that role, I took the revenue stream from slightly under \$1 million, to a revenue stream of slightly more than \$40 million with an EBITDA of 17%.

5. When I began, the company was losing money badly, and trying to determine whether or not to declare bankruptcy. To get this 40-fold increase in revenue and a running \$8 million annual profit line, you have to dramatically change the culture of the company. I feel that you have to be a fully engaged and interactive leader who truly understands people and what they do to achieve great success within the company piecemeal and as a whole.

6. No job/task was beyond me, including working with the machinists. After cutting headcount in half from 52 to 26 to get the output aligned with input in a way that would allow for exponential growth in revenue and profitability, I mixed with every single employee. I was personally engaged

and spent time working on 5 and 7 axis CNC machines and 3D printers in producing and fabricating extremely defined and intricate parts. I spent time with the engineers reviewing and advancing designs. I spent time with every salesperson getting to know and increase our contacts and customers and increasing our channels to market 9-fold. I negotiated contracts with domestic and foreign governments as well as many domestic and foreign law enforcement agencies.

7. To work in sales and marketing and design/functionality in gaining customers and negotiating contracts, one must know the intricacies of the specific design of the suppressor, how it works in every aspect, what makes it stand apart in the marketplace, hence giving the customer full understanding of why your design and your unit is the best in the marketplace. The demand for our product quickly got so pressing that I had to find OEM outsourced manufacturing sources with top precision, quality and repeatability. I had to be very involved with our manufacturing team in the disciplined train-up and handoff of the designs to be sure the OEM skills were in place to attain the precision of the drawings precisely. Hence, I was intimately familiar and knowledgeable about our very new and unique design and make-up of our suppressor products. At OSS, all we did was suppressors. It was our entire business.

8. The role that I held prior to being the CEO of OSS Suppressors, was the President and COO of Strategic Armory Corps. I worked in this role for 2 ½ years. SAC was a holding company made up of 5 small arms and defense companies: ArmaLite, Surgeon Rifles, Macmillan Firearms, AWC Silencers, and Nexus Ammunition. With AWC Silencers being part of that holding group, of course I worked closely and had full responsibility over this suppressor company.

9. The AWC suppressors were a different design and had a differing internal configuration than both the OSS Suppressor and the '906 Patent under consideration today. In simplest terms, the AWC suppressor was a basic design of 5 or 6 layers of baffles, depending upon the size of the suppressor and the caliber of the round it was suppressing. The OSS suppressor was a unique flow of gases going through a labyrinth of passages continuously moving gases and pressure towards the far end of the suppressor, then continuously routed back towards the muzzle of the firearm, and then making a final turn of movement back towards the end of the suppressor and out of the end cap. Given that none of the gases were ever stopped by a baffle, the gases and pressure were never halted, which would more abruptly change the site picture from causing an instant recoil felt at the shooter's shoulder.

10. This number of years spent with AWC suppressors gave me experience in a completely different look in designs and intentions of various suppressors. In these previous two roles I came to understand how a POSITA in the suppressor manufacturing area must understand and capitalize on design and functionality differences.

11. Prior to my time with Strategic Armory Corps and AWC's silencers, I worked for 5 years As the CEO of KRISS USA. This was the US headquarters for a Swiss arms company. And it migrated to be the global headquarters for all of the commercial work in the design, manufacturing, and sales for the compact rifle, KRISS Vector, with a very unique reduced recoil system. We did not manufacture suppressors at KRISS. However, in a 25-fold increase in manufacturing and sales and profitability during the time that I was there, we got into global contracts that required us to do significant testing with various suppressors in order to fulfil the requirements of our customers in our dynamic growth.

12. All this transformation and turn-around work for small and mid-capped companies started from a phone call that I got from Major General Joseph Franklin, who had previously been the Commandant of Cadets while I was at the United States Military Academy. He had been brought onto the board of KRISS USA in order to find the leadership to turn the

performance of the company around. So, his call to me twenty-five years after I graduated from the academy, was what got me focused on transformation work in the defense arena.

13. I served as an Infantry 2LT Platoon Leader at Fort Stewart, GA in the 24th Infantry Division. I then moved on to serve as the Scout Platoon Leader for the same battalion there at the 24th ID. After that first three years as an infantry officer, I transferred to the 101st Airborne Division at Fort Campbell, KY. We often worked with suppressors in the military. My first assignment was the battalion executive officer. I then, as a Captain, had a successful company command of Bravo Company, 1/502nd Infantry Regiment. As a Company Commander in the 101st Airborne Division, I had complete responsibility for the training, discipline, fitness and combat readiness of 132 soldiers. As Company Commander, our unit set several company level achievement records for fitness, marksmanship and team testing. Hence, we were marked and noted as a stand-out unit of the Rapid Deployment Force.

14. Intermixed within my specific assignments as an officer, I attended and graduated from Ranger School, Airborne School, and Air Assault School. All of these assignments and all of these schools had me

continuously utilizing and training with small arms and peripherals such as suppressors.

15. I believe I am qualified to opine in this matter as a result of my education and work experience. Consistent with my definition of a POSITA below, I would have the expertise in suppressors, fluid dynamics, pressure equalization, modular pressure systems and gas systems to understand and opine on the '906 Patent's novelty. My CV is enclosed below as Exhibit A.

II. MATERIALS REVIEWED

16. In reaching my opinion in this manner, I relied on the following materials:

- U.S. Patent No. 12,018,906 B2 ('906 Patent);
- Declaration of Robert S. Silvers (Ex. 1008);
- Belykov | Published Patent No. US 2021/0207916 A1;
- Sclafani | Published Patent No. US 2015/0285575 A1;
- Noonan | Registered Patent No. 11,268,776;
- Slack | Published Patent No. US 2021/0381793;
- Muceus | Published Patent No. US 2022/0276015;
- Petition for *Inter Partes* Review of US Patent 12,018,906; and
- Prosecution of US Patent 12,018,906.

III. LEGAL FRAMEWORK

17. I am an operational and technical expert and do not offer any legal opinions. However, I have been informed about certain legal principles regarding patentability and related matters under United States patent law, which I have applied in performing my analysis and arriving at my technical opinions in this matter.

A. Anticipation

18. Counsel has also informed me that the express or inherent disclosures of a prior art reference may anticipate the claimed invention. Specifically, if a person having ordinary skill in the art (POSITA) at the time of the invention would have known that the claimed subject matter is necessarily present in a prior art reference, then the prior art reference may “anticipate” the claim. In other words, if the prior art necessarily functions in accordance with or includes the claimed limitations, it anticipates. There is no requirement that a person of ordinary skill in the art would have recognized the inherent disclosure at the time of invention, but only that the subject matter is, in fact, inherent in the prior art reference. Therefore, a claim is “anticipated” by the prior art if each and every limitation of the claim is found, either expressly or inherently, in a single item of prior art.

B. Obviousness

19. I understand that, in this *inter partes* review, the Petitioner has argued that certain claims of the '906 Patent are obvious. Counsel explained that a patent claim is invalid as obvious where the differences between the subject matter claimed and what was known in the prior art would have been obvious to a person of ordinary skill in the relevant field at the time the invention was made.

20. Counsel explained that an analysis of obviousness requires consideration of four factual inquiries. Counsel explained that these inquiries are:

- (1) the scope and content of the prior art;
- (2) the differences between the prior art and the claims;
- (3) the level of ordinary skill in the relevant field; and;
- (4) whether what counsel described as "secondary considerations" or "objective indicia" of nonobviousness are shown by the evidence.

21. Counsel explained that a POSITA in the relevant art is not a robot (or "automaton"), but instead a person with ordinary creativity and common sense who would apply that creativity and common sense, along with relevant background knowledge, to the problems at hand.

22. I understand that a patent may be invalid as obvious in view of a single prior art reference or multiple prior art references together, and that

the background knowledge of, and common-sense inferences that would be made by, a person of ordinary skill in the art may be considered in determining whether a claim is obvious.

23. Counsel informed me that for a prior art reference to be proper for use in an obviousness analysis, the reference must be “analogous art” to the claimed invention. I have been informed that a reference is analogous art to the claimed invention if:

(1) the reference is from the same field of endeavor as the claimed invention (even if it addresses a different problem); or

(2) the reference is reasonably pertinent to the problem faced by the inventor (even if it is not in the same field of endeavor as the claimed invention). In order for a reference to be “reasonably pertinent” to the problem, it must logically have commended itself to an inventor's attention in considering his problem.

In determining whether a reference is reasonably pertinent, one should consider the problem faced by the inventor, as reflected either explicitly or implicitly, in the specification.

24. Counsel informed me that there need not be a specific teaching, motivation, or suggestion in the prior art to combine or modify prior art references in a particular way. For instance, the background knowledge or

common sense of a person of skill could make a claim of an obvious variation of what was already known. However, there must be an articulable reason as to why a particular combination would be made or a specific reference modified.

25. I have also been informed that it is improper, in an obviousness analysis, to apply hindsight, and in particular to use the patent claims as a roadmap to assemble a collection of references or modifications to references. I understand that the proper question is what would have been obvious to a person of ordinary skill in the art without the benefit of hindsight and specifically without access to the patent at issue.

IV. CLAIM CONSTRUCTION

26. Counsel has informed me that the first step in a validity analysis involves construing the claims, as necessary, to determine their scope. The construed claim language may then be compared to the prior art disclosures. Counsel has informed me that in proceedings before the PTAB the claims are generally given their ordinary and customary meaning as understood by one of ordinary skill in the art at the time of the invention, in light of the patent specification. I have been informed that the Board applies the broadest reasonable interpretation (BRI) standard in interpreting claims during *inter partes* review proceedings. Accordingly, my understanding of

the claim terms is based on the ordinary and customary meaning the terms would have had to a POSITA as of the priority date of the '906 Patent, in light of the specification, drawings, and relevant knowledge in the field.

Unless otherwise stated, I have applied the plain and ordinary meanings of claim terms as understood by a POSITA at the time of the invention. Where clarification is needed to assess the prior art, I offer interpretations based on my technical experience and review of the intrinsic evidence.

A. Non-Construed Claim Terms

27. For claim terms not construed, I have applied the meaning of the claim terms of the '906 Patent that are generally consistent with the terms' ordinary and customary meaning, as a person of ordinary skill in the art would have understood them at the time of the invention. I have been instructed to assume for purposes of this proceeding that the time of the invention is the earliest priority date of the '906 Patent, which counsel has informed me is Oct 27, 2022.

B. Construed Claims

28. I agree with petitioner's expert Robert Silvers that there are no claim limitations which need to be construed.

V. LEVEL OF A PERSON HAVING ORDINARY SKILL IN THE ART

29. Based on my experience, a POSITA at the relevant priority date in 2022 would have had a four year degree in engineering or design as well as 2 – 3 years of knowledge and experience working in the suppressor industry.

VI. OVERVIEW OF THE '906 PATENT

30. The '906 Patent discloses and teaches a modular firearm suppressor with a uniform-diameter housing and removable core, featuring a continuous channel between the core's outer surface and the housing inner surface. Pressurized gas is fed by a plurality of core apertures into this channel enabling axial pressure equalization from the first end to the second end, reducing blowback, heat buildup, and improving performance. These teachings are distinct from the Prior Art References which have discrete chambers or interrupted gas flow.

31. I opine as a POSITA, that "channel" in the '906 Patent means a continuous, unbroken, annular path capable of longitudinal gas propagation (see Figures 1 – 3). A POSITA would have understood the phrase "circumscribing the outer surface" found in the claims of the '906 Patent (including Claim 1) to require a 360-degree encirclement without interruptions which "equalizes pressure . . . from the first end . . . to the

second end” and requires functional axial flow, not localized venting and venting chambers lacking continuity.

VII. OVERVIEW OF CHALLENGES AND RELIEF REQUESTED

32. As I direct my attention to the ‘906 Patent, I note that this patent has already been granted or awarded. I am informed that patents are allowed a presumption of validity and am aware that Dead Air Armament LLC is bringing challenge to the validity of the ‘906 Patent in this IPR.

33. Given that suppressors have been in the marketplace for decades, it may be easier for parties such as Dead Air to attack original ideas for advancing suppressors in the art in the retrospective manner that Dead Air seems to be attempting, by taking the ‘906 Patent and finding many pieces of art and attempting to combine portions of them to detract or marginalize novelty in advancements.

A. Universal Problems with Dead Air’s Expert Opinion

i. The “continuous circumferential channel”

34. Based on my experience, a POSITA during the time period of the earliest priority date would have understood “continuous circumferential channel” to require an uninterrupted annular structure surrounding the internal flow path of the suppressor housing, forming a closed loop running

360° around the internal flow path without substantial obstruction or segmentation.

35. I believe that a “continuous circumferential channel” is distinguished in the mind of a POSITA from the isolated or segmented cavities on opposite sides or ends of the housing. Because the ‘906 Patent introduces a channel which must circumscribe the central core to distribute gas pressure uniformly, Mr. Silvers’ assertion that discrete pockets on opposite sides could be construed as a “continuous channel” is inconsistent with how a POSITA would interpret the term in light of the ‘906 Patent and common understandings of a POSITA as well as common design principles in the suppressor industry.

36. A POSITA would understand that segmented cavities do not equalize pressure circumferentially. Rather, these segmented cavities cause localized pressure areas within the suppressor design. A POSITA would understand that this is not the stated goal of the ‘906 Patent.

ii. “Equalizes Pressure From the First End to the Second End”

37. I have reviewed Belykov, Sclafani, Noonan, Slack and Muceus (collectively the “Prior Art References”) and believe that a POSITA would

not understand these references to teach the equalization of pressure from end-to-end in a suppressor design. Rather, they indicate more distinct isolated or segmented cavities on opposite sides of the housing. I believe that a channel circumscribing the central core to distribute gas pressure uniformly would not be understood by a POSITA to be taught by the Prior Art References and POSITA would not have been motivated to equalize pressure in the manner taught by the '906 Patent from these references.

38. The segmented cavities of the Prior Art References do not equalize pressure circumferentially—they promote localized pressure zones, undermining the stated goal of the invention disclosed by the '906 Patent.

39. A POSITA would understand that to achieve pressure equalization, the channel must interact fluidly with other internal apertures and structures in a manner which prevents obstructing and trapping gases in compartmentalized areas.

40. I opine that a POSITA would have understood that the Prior Art References block axial flow. Mr. Silvers' assertion that these designs equalize pressure is not physically accurate because the design channels shown in the Prior Art References show obstructed pathways.

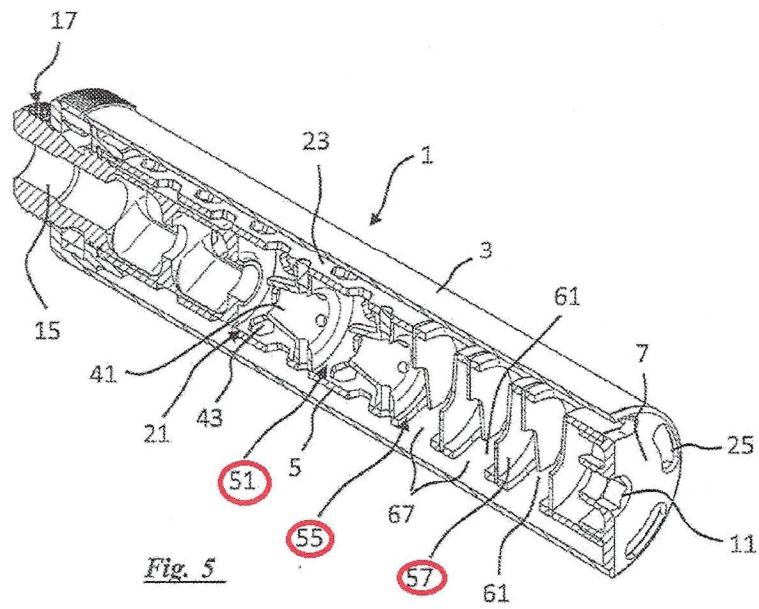
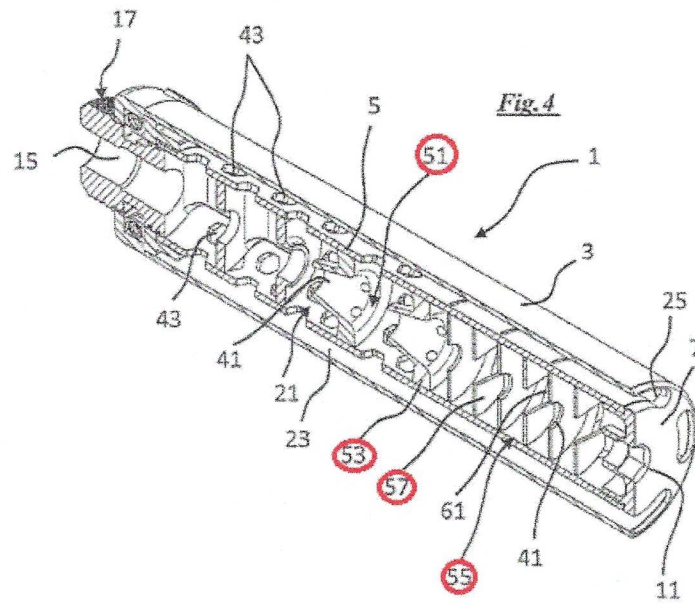
41. A POSITA would not have been motivated to combine the structures in the Prior Art References to equalize pressure because the channels in these references cannot be combined mechanically to form the circumferential and continuous channel in the '906 Patent without substantial redesign.

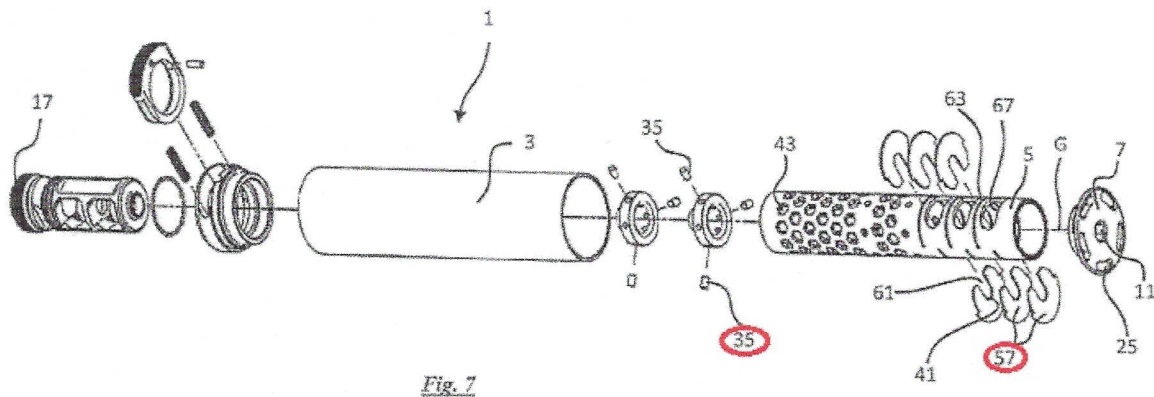
42. I believe that none of the Prior Art References, individually or combined, disclose a continuous channel as claimed in the '906 Patent and understood by a POSITA.

iii. Belykov (Ex. 1003)

43. Belykov's "annular gap" is interrupted by baffles, spacers, welds and contact points (see Figures 2 – 7 of Belykov) creating isolated chambers, not axial flow. A POSITA would understand this prevents full pressure equalization, as gases expand radially into segments, not longitudinally. Silver's claims at paragraph 50 – 60 of "ubiquitous" annuli ignore these discontinuities and are contradicted by Belykov's test emphasizing chamber isolation for sound reduction.

44. Figures 4, 5, and 7 from Belykov, show some of these discontinuities, which are highlighted in annotated Figure 4, 5 and 7 below.





In Figures 4 and 5 above, reference characters 51, 53, 55, and 57 all show aspects of the Belykov design that would impede the flow of gases.

- 51 channel intermediate chamber
- 53 second sound impact wall
- 55 channel end chamber
- 57 third sound impact wall

And in Figure 7 above, reference character 57 again shows the “sound impact wall” being an insert or aspect of the design that would impede the flow of gases.

- 35 mounting pin

Demonstrates that the core is not readily removable, making the core integrated, *permanently* fastened, and non-serviceable.

iv. Noonan (Ex. 1004)

45. Noonan does not disclose a suppressor. Rather, Noonan discloses a flash hider which reduces recoil. See Silvers' Declaration ¶ 72 ("Noonan is directed to an expansion chamber assembly for a firearm that 'reduces muzzle flash and/recoil generated by the firearm when firing a bullet'"). The abstract of Noonan summarizes Noonan as an "expansion chamber . . . allow[ing] gases to exit the expansion chamber assembly" through exit apertures. Noonan teaches that these exit apertures may exist on both ends of its disclosed flash hider, expelling gas backwards which does not serve to equalize pressure longitudinally. Additionally, the annular recess disclosed by Noonan is filled with sound-absorbing material to reduce flash and sound. See Fig 7A. Noonan shows in Fig. 3A a device would be missing apertures on the first third of the inner tube, which does not permit pressure equalization. Rather, Noonan teaches gas expansion. The interior surface of the Noonan housing is shown with threading, which would interrupt gas flow. A POSITA would not have been motivated to combine Noonan with the other Prior Art References.

v. Sclafani (Ex. 1007)

46. Threaded modular rings create sealed segments with dead zones as shown in Figures 1-3 and these threads obstruct flow. No continuous path for gas expansion is disclosed, and Mr. Silver's overlooks the sealing effects in paragraph 80 – 85 of this opinion.

vi. Slack (Ex. 1006)

47. Slack does not disclose conical baffles and lateral vents from discrete turbulence chambers as shown in Figures 2, 5, 6, and 7A and there is no annular continuity or uninterrupted longitudinal flow.

vii. Muceus (Ex. 1005)

48. Muceus disclosed a core with complex helical channeling configured to reduce noise. The engineered channels of Muceus do not facilitate continuous pressure equalization, as the '906 Patent open longitudinal channel teaches. A POSITA would not have been motivated to combine Muceus with the other Prior Art References to create the '906 Patent.

49. All of the Prior Art References are missing improvements disclosed by of the '906 Patent.

B. Specific Problems

50. Dead Air asserts in Ground 1 that "Claims 1-6 and Claims 9-11 are rendered obvious" by Belykov in view of Sclafani. A POSITA like me would

not have thought to combine Belykov and Sclafani, making this combination of art impermissible in retrospection.

51. Since Ground 1 seems to be the broadest attack against the '906 Patent, I will get into some specific detail here as to why Ground 1 fails against the '906 Patent.

52. Claims 1-6 and 9-11 are challenged under Ground 1 and recite non-incidental structures of a suppressor and require multiple coordinated elements, including requiring all of the following: (1) a removable inner core, (2) a continuous circumferential annular channel, and (3) purposeful radial apertures which feed gas into this channel.

53. The Prior Art References do not clearly teach this architecture, nor do they teach or disclosure the limitations of the challenged claims challenged under Ground 1, including a channel extending substantially the length of the core, an uninterrupted circumferential channel, and non-incidental voids. A POSITA would not have been motivated to combine Belykov and Sclafani in this manner.

54. The dependent claims require, among other things, radial gas transfer into the channel and specify apertures on the outside of the core, radially (outward) gas flow. Belykov and Sclafani teach vents oriented

axially forward and into discrete chambers. Belykov and Sclafani do not teach an apparatus that directs gas radially into a separate outer pathway.

55. The core of the '906 Patent, in and of itself, includes specific aperture patterns on its outer surface that feed gas into the channel and work in conjunction with internal baffles to slow and cool the propellant gases.

56. A POSITA would have understood that this morphological arrangement of apertures in baffles is more deliberate compared to simple linear baffle stacks in many prior suppressors. Argument would contend that once monocoresh and venting existed, adding an outer channel would have been obvious. The '906 Patent did not *motivate* that combination. Only the '906 Patent teaches to use the outer annulus as a pressure management system.

57. The Prior Art References often rely on arrangements/design and standard baffle shapes without this type of engineered gas inlet/outlet pattern integrated into a removable core.

58. This channel will equalize gas pressure from the muzzle end toward the exit, which is different from traditional baffle stacks or lesser designed passages that simply slow and cool gas without a defined pressure equalizing passage.

59. Further, gas enters the channel through multiple apertures in accordance with the '906 Patent in the core distributing pressure around the core rather than only down the bore or through generic baffle chambers.

60. The fact that the core of the '906 Patent is easily removable is a significant advantage for tactical operators. It would require no special tools for removal in consideration of cleaning or proofing the operation. This would coincide with an infantryman's desire to "travel light, freeze at night." In other words, do not require carrying additional tools for assembly/disassembly, or introduce the possibility of degradation of additional parts for attaching the core if not necessary.

61. Prior art references rely on a series of baffles or expansion chambers with no equivalent circumscribing pressure channels. Here, in the '906 Patent, the gas management is integral to the claimed structure, potentially reducing muzzle blast and back pressure more effectively.

62. The claims of the '906 Patent emphasize that the channel created around the core equalizes pressure throughout the suppressor rather than only letting gasses vent passively through baffle chambers. A POSITA would not recognize this in the Prior Art References.

63. Claim 1, which the USPTO allowed, attempts to reduce back gassing (gas escaping toward the shooter and action), a common downside in traditional suppressors. This distributes pressure along the entire suppressor length.

64. As a POSITA, I do not see this functionality created by Claim 1 to reduce localized pressure spikes in the Prior Art References. The channel and core arrangement therefore claims an engineered path and function that is distinct from static baffle geometries alone.

65. The Prior Art References do not directly “equalize pressure” between core and housing, they rely on sequential expansion chambers. The claimed channel concept is a specific structural and functional limitation.

i. Novel End Cap Configurations and Closure Caps

66. The end cap used in the '906 Patent is a unique cover end cap structure with dedicated pressure channels and closure channels that can accept a key or closure member to further control exiting gas.

67. This is more than just a threaded end cap; the cap itself is designed to work with internal pressure pathways.

68. The suppressor on the '906 patent comes with two differentiated end cap structures that allow the shooter to determine the amount of gasses

being either concentrated at the end of the rifle and suppressor muzzle or, if preferred, more so concentrated for gases at the ejection port. This would depend upon whether the shooter wants more focus on the shooter's sight vision (less gases at the ejection port) or rather suppression of flash at the end of the full device.

69. The cap of the '906 Patent is defined as part of a specific integrated pressure control system rather than generic exit hardware. The '906 Patent end caps are not suggested to a POSITA by the Prior Art References.

C. General Defects in Opinion of Robert Silvers

70. I believe that Mr. Silver's offers conclusory opinions without empirical or computational support. For example, he asserts that certain structures would equalize pressure or form a circumferential channel without offering supporting simulations, tests or schematics, when such structures would not accomplish pressure equalization.

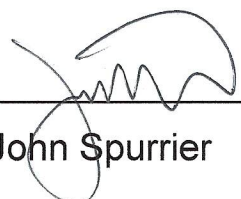
71. In my opinion, his assertions in Ex. 1008 would not be accepted as sound engineering by a POSITA and ignore real-world engineering restraints.

VIII. CONCLUSION

72. Based on my analysis, it is my opinion that POSITA would not have been motivated to combine the Prior Art References to form a continuous circumferential channel or its functionality, and that the structures taught by the Prior Art References do not permit equalization as understood by a POSITA. My Silver's testimony is unsupported and inconsistent with physical and mechanical principles governing gas dynamics in suppressors.

73. I declare that the foregoing are true and correct statements to the best of my knowledge. All statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge and that willful false statement and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the U.S. Code.

30 JAN 2016
Date



John Spurrier