FBI Exhibit No. 1: FoodQuestTQ Doctoral Research Dissertation

In **August 2006**, The George Washington University published a doctoral dissertation that contained the patented and unpatented ideas of FoodQuestTQ. The dissertation details a five year program of research to scientifically determine, quantify and structure specific incident prevention and risk mitigation strategies and criteria. The dissertation describes the application of the patented and unpatented ideas across multiple critical infrastructures and specifically addresses the food supply system. The research dissertation was copyrighted in 2006 and widely published by The George Washington University. A copy of the complete research dissertation is available at [FBI Exhibit No 1 a.](FBI%20Exhibit%20No.%201%20a..pdf)

FoodQuestTQ LLC alleges that the U.S. Government by negligence, intention or both did, in fact, fail to conduct the due diligence, i.e., an informal or formal copyright search, required to assure that the U.S. Government was not in violation of existing copyright and by negligence, intention or both, did, in fact, make unauthorized use of FoodQuestTQ written and copyrighted expressions of ideas in the Food and Drug Administration Food Protection Plan and several U.S. government produced automated computer food risk management tools.

Against the same standards used by the Food and Drug Administration’s own Office of Research Integrity, a page-by-page analysis of the patented and unpatented ideas contained in the copyrighted dissertation against the FDA’s November 2007 Food Protection Plan demonstrates gross and intentional plagiarism by virtue of the appearance of identical ideas, words and order of presentation of ideas. [FBI Exhibit No. 1 b.](FBI%20Exhibit%20No.%201%20b) contains a detailed crosswalk between the copyrighted expressions of ideas contained in the plaintiff’s doctoral dissertation and the subsequent FDA National Food Protection Plan that was published several months later by the FDA in November 2007.

FoodQuestTQ LLC alleges that the U.S. Government did not conduct due diligence i.e., an informal or formal copyright and patent search, required to assure that the U.S. Government was not in violation of the pre-existing patents or copyrighted works of others.