GMA EXHIBIT 31: U.S. Food and Drug Administration (FDA) publication of Projectioneering LLC-owned trade secrets.

GMA possession and use of the misappropriated trade secret information resulted from gleaning trade secret information by GMA member companies from the following tools published by the FDA and interactions between GMA and its member companies and members of the FDA Food Defense Team.

In 2010, the FDA copyrighted and publicly released to GMA and its member companies a computer automated food risk management tool called iRisk. The iRisk tool uses FoodQuestTQ LLC patented and unpatented ideas and trade secrets to scientifically determine, quantify and structure specific incident prevention and risk mitigation strategies and criteria along the food supply chain.

In 2011, the FDA released another computer automated food risk management tool called the Food Defense Mitigation Strategies Database. The new FDA tool contained the patented and unpatented ideas, trade secrets and copyrighted written expressions of Projectioneering LLC-owned intellectual property

Also in 2011, the FDA released their Food Response Emergency Exercise Bundled or FREE-B tool. The new FDA tool contained the patented and unpatented ideas, trade secrets and copyrighted written expressions of the intellectual property contained in the FoodQuestTQ LLC researcher’s 2003 invention disclosure; his July 2007 pending patent (final patent granted in 2012); his August 2006 dissertation and; the unsolicited proposal presented to FDA on March 25, 2009.

In 2013, FDA released their Food Defense Plan Builder software tool at their official U.S. Government website for industry use free of any charge. The new FDA tool contained the patented and unpatented ideas, trade secrets and copyrighted written expressions of the intellectual property contained in the FoodQuestTQ LLC researcher’s 2003 invention disclosure; his July 2007 pending patent (final patent granted in 2012); his August 2006 dissertation; the unsolicited proposal presented to FDA on March 25, 2009, and; the June 2011, February 2011, and October 2012 FoodQuestTQ LLC demonstrations of their software tools to the FDA.

Over the entire period 2003 to 2007 various improvements were made by the FDA to their CARVER + Shock tool. The new FDA tool contained Projectioneering patented and unpatented ideas and trade secrets.