

GRAPH A

ARBITRATOR DISCLOSURE FAILURES & EVIDENT PARTIALITY

■ MISLEADING DISCLOSURES | ■ OMITTED MATERIAL CONFLICTS

TIMELINE

DATE	EVENT	ISSUE
Sept 30, 2022	Oath + Initial Disclosure	■ Denied relationships
Oct 3–4, 2022	Oath + Supplemental	■ Minor disclosures only
Oct 19, 2022	Appointed Arbitrator	■ Conflicts hidden
June 15, 2023	Late Disclosure	■ Partial truth
June 23, 2023	Reaffirmed	■ Too late to object

OATH vs REALITY

OATH (SWORN STATEMENTS)	REALITY (ACTUAL RECORD)
No relationship with witnesses	Collins = long-term personal + professional relationship
All conflicts disclosed	Material conflicts omitted
Diligent conflicts check performed	Known relationships not disclosed
No appearance of partiality	Multiple undisclosed ties create clear appearance of bias

COUNT THE OMISSIONS

CATEGORY	OMISSION
Witness Relationships	Denied but existed
Personal Relationship	Divorce attorney
Professional Relationship	Worked under Collins
Financial Relationship	Bankruptcy + employment overlap
Ongoing Connections	Firm/business ties
Depth of Relationship	35+ years omitted

CONCLUSION: The oath certifies full disclosure. The record proves otherwise. This is not an oversight—it is a pattern of selective disclosure creating evident partiality.