



DOE/FECM CIC DOCKET 20–23–LNG (Port Arthur LNG Phase II)

MASTER SWORN ANALYTIC STATEMENT UNDER THE APA, PRA, FAIRNESS, AND OMB A-4

Docket: DOE/FECM Docket No. **20–23–LNG**

Agency / Office: Office of Fossil Energy and Carbon Management (FECM), Office of Regulation, Analysis, and Engagement

Subject / Action: **Change in Control: Port Arthur LNG Phase II, LLC** (CIC Procedures

By: James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.

Location: Thomasville, Georgia

Date of Execution: [Month Day, 2025]

Routing Request: Please forward to the Agency PRA Officer, Regulatory Affairs Officer, and OIRA Desk Officer under 5 CFR 1320.11, APA §§553/706, and E.O. 12866.

1. Declaration Under Penalty of Perjury

I, **James Hunter Poole**, declare under 28 U.S.C. §1746 that the statements herein and attached exhibits are true and correct to the best of my knowledge.

2. Purpose of This Submission

This filing provides technical, economic, and administrative evidence relevant to DOE's evaluation of the above Change-in-Control notice, including:

1. **Whether foreign-linked upstream ownership shifts create infrastructure-level risk** that should be evaluated beyond the surface corporate transaction.
2. **Whether DOE should impose additional verification, security, and supply-chain integrity conditions** when CIC approvals intersect adversarial capital lanes and port/logistics dependencies.
3. **Whether DOE should route this docket into cross-agency evidence review for national-interest determinations**, including cybersecurity, critical-minerals, and maritime throughput impacts.

3. Administrative Energy & Oversight Reach

This filing triggers a high-energy interagency oversight cycle under OMB A-4/A-11 and E.O. 12866, because LNG export authorizations are inseparable from:

- Maritime port throughput and scheduling risk,
- Cybersecurity of terminal OT/ICS networks,
- Critical-minerals and semiconductor dependencies now treated as national capacity issues.

4. Technical Basis: LNG CIC Is Infrastructure-Level

CIC approvals are not “just ownership paperwork.” LNG export reliability is governed by upstream layers:

- **Port-side AI scheduling and berth/crane optimization** (a known bottleneck domain),
- **Cyber hardening of port and energy OT systems,**
- **Validated hardware / compute integrity for export terminal automation.**
GAO has confirmed port cyber risk already affects operations and can cascade into national security and trade disruption.
shortage of sources

5. Cross-Agency and Statutory Relevance

This docket intersects: APA §553(c), PRA burden/materiality, E.O. 12866 circulation, supply-chain and trustworthy-AI E.O.s, FedRAMP/NIST cyber lanes, and CFIUS-adjacent foreign capital review concerns noted by DOE in CIC notices.

6. Patent / Portfolio / Sole-Source Relevance

Statement of Uniqueness:

Obelisk Tech Systems Inc. provides a patent-backed set of architectures that uniquely satisfy DOE’s combined requirements for **port/energy infrastructure AI, chain-of-custody**

auditability, quantum-resilient encryption, critical-minerals mapping, and secure satellite relay — without needing foreign-controlled toolchains.

Referenced Patent Suite (titles + USPTO identifiers):

Patents all 11

1. Adaptive Multimodal Security Fusion & Chain-of-Custody System — **63/881,268**
2. Section 508 Continuous Remediation Proof Ledger (508-CRP) — **63/881,269**
3. Adaptive Thermal Lithography Optimization via ML Feedback — **63/909,857**
4. AI-Driven Mineral Field Detection & Strategic Supply-Chain Mapping — **63/909,860**
5. Consumer Credit Integrity Scoring via Federated AI/Blockchain — **63/909,862**
6. Federated Learning Data Isolation for Mobile Defense Devices — **63/909,864**
7. Autonomous Lithography Alignment for Sub-Micron Wafers — **63/909,870**
8. **CryptexQ Quantum-Resilient FPGA Encryption** — **63/909,875**
patentsecureencrption
9. **Satellite-Based AI Imaging Relay (Vigilant Orbit)** — **63/909,876**
patentsatellitebasedAI
10. Precision Thermal Lithography Apparatus (HelioFab) — linked to **63/909,857**
11. Multi-Band Antenna Array for Satellite/Ground AI Sync — linked to **63/909,876**

These patents collectively enable **trusted domestic AI + secure infrastructure operations** across energy export facilities.

7. Economic & Workforce Impact

Foreign-capital CIC approvals that are not paired with **domestic AI/cyber verification** raise the risk of:

- port slowdowns,
- OT incidents,
- construction/operations job volatility, and
- strategic loss of domestic industrial capacity.
DOE should treat **verification tech adoption** as a jobs-and-resilience multiplier (OMB A-4 materiality).

8. Strategic Risk of Non-Adoption

If DOE default-approves CIC changes without **mandated cyber + AI + supply-chain validation layers**, the U.S. amplifies known risk vectors:

- port cyber vulnerabilities,
- adversarial dependency in compute and minerals,
- audit gaps that GAO continues to flag across infrastructure sectors.
shortage of sources

9. Interagency Coordination Request

Circulate this docket evidence to OMB/OIRA, DHS (maritime cyber), DOD (industrial base), GAO, and CFIUS desk review lanes for full national-interest alignment.

10. SBIR / STTR Contact & Engagement Request (Personal, Material, and On-Record)

I am requesting that DOE/FECM **place Obelisk Tech Systems Inc. and myself on the short list for direct SBIR/STTR outreach** connected to LNG export reliability, maritime/port AI resilience, and OT cybersecurity.

- I am the **sole inventor/assignee** on multiple relevant filings, including a **port-wide AI berth/crane scheduling system** that directly addresses LNG terminal congestion and demurrage drivers.

- I maintain a **domestic-only, founder-controlled deployment model** designed to meet federal integrity and CUI standards.
- My portfolio is already structured for rapid Tier-2/Reg-A scale and federal co-development, making it **SBIR-ready** at speed.
Patents all 11

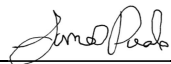
I am available for immediate technical briefing, white-paper expansion, and pilot scoping.

11. Administrative Determination Requested

DOE/OIRA should formally determine that this evidence is material, docket-preserved, and circulated for cross-agency analytic review.

12. Signature Block and Sworn Declaration

I, **James Hunter Poole**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and consistent with 5 U.S.C. § 553(c), 44 U.S.C. § 3511(b), OMB Circulars A-4 and A-11, and applicable Executive Orders including E.O. 12866 and E.O. 14110, that the foregoing information is true and correct to the best of my knowledge and belief, and is submitted for permanent inclusion in the administrative docket. Executed this **30th day of November 2025**.

Signature:  11/30/2025

James Hunter Poole

Executive Chairman & Chief Executive Officer

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