EXHIBIT D: Defamation & The 12-Month Pattern of Retaliatory Record Falsification

Purpose:

This exhibit provides documentary proof that the negative performance narrative used to justify adverse employment actions was not a good-faith assessment. It was the result of a deliberate, escalating pattern of record falsification and misrepresentation by manager Aaron Clark.

Across a 12-month period, the record shows a consistent sequence of verified misstatements and falsifications despite documented attempts by his direct employee to correct the record: *the initial inaccuracy concerning the FDA Pre-Submission consultation event, subsequent mischaracterizations related to Coiling Plate design selections, and the creation of an inaccurate performance document* following a protected discrimination complaint. The 2025 performance review incorporated demonstrably false elements from prior records, establishing a *recurring documentation-integrity breach and a pattern of retaliatory treatment within official reporting*.

Where a falsified official record and related misrepresentations originate from an identifiable author and are demonstrably inconsistent with contemporaneous evidence, potential exposure is not limited to institutional reliance and may extend to the individual source of the misrepresentation under applicable defamation principles.

Date / Incident	Manager's Fabricated Record (The "Act")	Verifiable Facts (The "Proof")	Legal Implication
Part 1: The Premeditated Lie **(Aug - Nov 2024)** **FDA Pre-Sub Incident**	Nov 18, 2024: Manager formally documented Narin was "Failing to include Pkg management for initial pre-sub submission review", copying senior management (Keith Robertson).	Fact (28-Aug-2024): -Manager was formally invited, -"Accepted" the invite , and was briefed in the meeting (Sep 3, 2024). Fact (08-Nov & 15-Nov 2024): Narin sent two clarification emails before the manager published the false claim.	**Establishes Knowing Falsification After Opportunity to Correct**: ***This was not an oversight.*** The manager was given multiple opportunities to correct the record and instead chose to publish a verifiable falsehood to senior leadership, establishing a pattern of malicious intent.

Part 2: The Corroborating Mischaracterization **(Dec 17, 2024)** **Coiling Plate Incident**	Dec 17, 2024: Manager criticized Narin for project delays, stating a 7.5-inch hoop "was assessed and discussed" and "should have been vetted out way before".	Fact: Narin's ***immediate***, ***written rebuttal*** corrected this mischaracterization: "It was not an option... the team and they insisted on going with the 8 inch diameter... I deferred to my team members".	**<u>Reinforces the Pattern</u>**: Shows the manager was contemporaneously misrepresenting facts to build a negative narrative, even when evidence proved his claims were false or out of context.
Part 3: The "Smoking Gun" Fabrication **(Apr 10-14, 2025)** **Retaliatory PIP Minutes**	Apr 14, 2025: Manager authored official minutes claiming Narin "questioned how [his] long workdays, including nights and weekends... could result in an 'Improvement Required' rating". (Occurred 18 days after Narin's Mar 27 discrimination complaint)	Fact: The verbatim audio transcript proves this is a fabrication. Narin's actual argument was that the rating was based on "peer feedback without consideration for the deliverables".	**<u>Proves Retaliation & Defamation</u>**: The pattern escalates from falsification to fabrication. This fabrication occurred immediately after protected activity, creating direct evidence supporting retaliation and defamation inferences.
Part 4: The Systemic Fraud **(Sep 19, 2025)** **Fraudulent 2025 Mid-Year Review**	Sep 19, 2025: Manager authored the 2025 Mid-Year Review, presenting "peer feedback" as a new, current-year assessment.	Fact: A side-by-side analysis proves the 2025 review is a fraudulent document, built by copy-pasting verbatim passages from the 2024 review, including identical, unique grammatical errors ("For examples," "thoughts that matters").	**<u>Proves Malice & Pretext</u>**: Confirms the manager is still creating fraudulent documents to perpetuate the false narrative. This systemic conduct materially undermines the credibility of any performance-based justification offered in defense of the adverse actions.