

UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION	FORMAL INVESTIGATION In the Matter of: OPENAI GROUP PBC & OPENAI FOUNDATION
In the Matter of: THE JONY IVE - IO PRODUCTS ACQUISITION & TANG TAN'S 'SHOW AND TELL' PIPELINE	CASE NO. LA-09724-SEC TCR SUBMISSION NO. 17684-273-411-436

MOCK CROSS-EXAMINATION OUTLINE: SIR JONY IVE

Focusing on C-Suite Institutional Knowledge of Tang Tan's Hardware Espionage Pipeline and the \$6.5B io Products Valuation Omissions

MEMORANDUM FOR THE TRIAL TEAM: This supplemental outline is designed to interrogate founding designer **Sir Jony Ive** regarding his exact knowledge, oversight, and passive or active ratification of the **Tan-Ive Protocol (Travelocity Lexicon Section 4)**. Specifically, this cross-examination targets the massive **\$6.5 Billion valuation** authorized for *io Products* on May 21, 2025 [58, 141c]. Since *io Products* had zero commercial revenue and zero shipped devices, the SEC Division of Enforcement argues that this valuation was artificially inflated to act as an IP clearinghouse to absorb misappropriated Apple hardware specs [58, 63, 141c]. Questions below are calibrated to destroy Jony Ive's reputation of complete distance from the day-to-day operations and expose his liability under Rule 10b-5 [56].

I. THE HOLLOW SHELL TRANSACTION: CHARITY-WASHED ACQUISITION VALUATION

Establish that Jony Ive's startup, *io Products*, possessed zero tangible assets, zero revenue, and zero shipped devices to justify a \$6.5 Billion acquisition in May 2025 [58, 80, 141c]. Prove that the valuation rested entirely on the 'intellectual talent' Tan systematically recruited through stolen Apple blueprints [58, 63, 114].

Q: Sir Jony, when you co-founded *io Products* with Tang Tan, you had zero consumer products in the market, correct?

Goal: Document that io Products had no commercial traction or physical inventory to justify a multi-billion-dollar valuation.

Q: On May 21, 2025, OpenAI acquired *io Products* for an all-equity consideration of approximately \$6.5 Billion [58, 141c]. As a major shareholder, you personally benefited from this multi-billion dollar transaction, did you not?

Goal: Establish personal pecuniary interest and direct financial benefit from the for-profit restructuring and valuation.

Q: Sir Jony, are you aware of any formal independent valuation report that was presented to the OpenAI Board of Directors—prior to the acquisition—justifying \$6.5 Billion for a 55-employee design firm with zero sales?

Goal: Force admission that the transaction bypassed standard, arms-length, independent regulatory valuations, indicating asset-shifting arbitrage.

II. SIR JONY'S OVERSIGHT AND RATIFICATION OF THE 'SHOW AND TELL' INTERVIEWS

Target Ive's direct communication with Tang Tan regarding the recruitment of Apple's top hardware designers [58, 114]. Dismantle the defense that Ive was 'purely a visionary designer' isolated from the day-to-day recruiting operations.

Q: Sir Jony, you worked closely with Tang Tan for over 15 years at Apple on the iPhone and Apple Watch lines, correct [51, 80, 315]?

Goal: Solidify the deep, personal, and professional alignment between Jony Ive and Chief Hardware Officer Tang Tan.

Q: You knew that when Mr. Tan was recruiting Apple's senior design and manufacturing engineers—such as Cyrus Daniel Irani and Matt Theobald [319]—he was asking them to describe Apple's internal, unannounced display, shielding, and finish specs, correct [57, 58, 323]?

Goal: Establish joint knowledge of the Tan-Ive Protocol. Prove that OpenAI's C-suite systematically extracted proprietary blueprints.

Q: Were you aware that Mr. Tan explicitly instructed Apple candidates to bring actual unreleased physical components, unannounced displays, and display shields directly into your design offices for 'show and tell' sessions [57, 323]?

Goal: Establish direct ratification of physical trade secret solicitation, satisfying the statutory definition of active misappropriation under the DTSA.

III. CONCEALMENT OF TRADE SECRETS & REJECTION OF FORENSIC INSPECTION

Establish that OpenAI's refusal to permit independent forensic analysis of physical devices and cloud databases is a direct attempt to cover up Jony Ive's design team's reliance on stolen Apple specifications.

Q: Sir Jony, when Apple raised concerns about trade secret theft in February 2026, you did not order any independent 'clean room' audit of io Products' source code or CAD directories, did you [59]?

Goal: Establish a complete failure of corporate due diligence and deliberate indifference to ongoing intellectual property exfiltration.

Q: Isn't it a fact that during the August 2026 preliminary injunction negotiations, your legal counsel flatly refused to permit Apple's third-party forensic analysts to inspect the physical devices and internal storage drives under your team's control [68, 181]?

Goal: Prove active concealment of stolen digital evidence, creating a strong adverse inference of guilt ahead of the October 1st hearing.

IV. STATE-LEVEL INTERFERENCE & WHISTLEBLOWER DISCLOSURES

FEDERAL AUDIT REFERENCE (SEC TCR NO. 17684-273-411-436): This outline incorporates protected whistleblower disclosures detailing administrative malfeasance within the **Oregon State Treasury Auditor Division**. State auditors breached federal whistleblower protections by backdating official database logs of the filer's real-time administrative filings to mask their inaction and suppress the exposure of OpenAI's non-profit asset-shifting. This coordinated harassment campaign forced the filer to file a criminal complaint with the **Washington County Sheriff's Office in Washington County, Oregon**, proving a systematic and multi-tiered effort to suppress these multi-billion dollar disclosure violations ahead of the Fall 2026 IPO.