

## AFFIDAVIT

### WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390

In accordance with 10 CFR 2.390 Public inspections, exemptions, requests for withholding, WHITE STAGG LLC requests that all submitted information regarding our product be withheld from public disclosure.

#### BACKGROUND

The concept and design of the HALO smoke detector was conceived out of a near disaster during the Joplin, Missouri tornado. The father of Chief Executive Officer and co-founder Benjamin Bradley Stagg barely escaped with his life due to lack of technology that provides early warning of tornados.

#### REQUEST FOR WITHHOLD FROM PUBLIC DISCLOSURE ITEM NUMBER 1

The unique and confidential design of the HALO smoke detector incorporates an ion chamber, photoelectric chamber, carbon monoxide detector and a weather alert radio that is incorporated in one smoke detector. There is currently no other commercially available smoke detector on the market that has all of these attributes.

The concept and design of the HALO smoke detector has been held in confidence by Benjamin Bradley Stagg (CEO of WHITE STAGG LLC) and not been released for public knowledge nor is it available to the public. This information is of the type that is normally held in confidence for any product that has the potential to change the landscape of multiple devices in the marketplace.

This request is being made to coincide with the initial submission of documents to the NRC for review and being made in confidence to the NRC as well.

Disclosure to the public of this information would cause substantial harm to the competitive position of WHITE STAGG LLC and cause irreversible damage to both the company's global financial position and manufacturing abilities. In addition, the concept and design information, if allowed to be disclosed, could easily be

duplicated by competitors and cause the loss of large sum of money expended in the design phase.

Benjamin Bradley Stagg, CEO, WHITE STAGG LLC is requesting that the design and concept of the HALO smoke detector be withheld from public disclosure per (a)(4) **Trade secrets and commercial or financial information obtained from a person and privileged or confidential.**

### **REQUEST FOR WITHHOLD FROM PUBLIC DISCLOSURE ITEM NUMBER 2**

The drawings for the HALO smoke detector incorporates the ion chamber, photoelectric chamber, carbon monoxide detector and the weather alert radio components. In addition, the printed circuit board drawing contains confidential information regarding the circuitry required for the proper operation of the smoke detector. The location of components and electrical operations have been developed by WHITE STAGG LLC engineering and are priority information.

The drawings have been held in confidence by Benjamin Bradley Stagg (CEO of WHITE STAGG LLC) and have not been released for public knowledge nor are they available to the public. This information is of the type that is normally held in confidence for any product that has the potential to change the landscape of multiple devices in the marketplace.

This request is being made to coincide with the initial submission of documents to the NRC for review and being made in confidence to the NRC as well.

Disclosure to the public of this information would cause substantial harm to the competitive position of WHITE STAGG LLC and cause irreversible damage to both the company's global financial position and manufacturing abilities. In addition, the drawings, if allowed to be disclosed, could easily be duplicated by competitors and cause loss of a large sum of money expended developing the drawings.

Benjamin Bradley Stagg, CEO, WHITE STAGG LLC, is requesting that all drawings pertaining to the HALO smoke detector be withheld from public disclosure per (a)(4) **Trade secrets and commercial or financial information obtained from a person and privileged or confidential.**

### **REQUEST FOR WITHHOLD FROM PUBLIC DISCLOSURE ITEM NUMBER 3**

The bill of materials for the HALO smoke detector contains the parts' manufacturer name, part number, full description, availability, drawing reference number, cost and an alternate part identification. The information is directly tied back to the design and manufacturing drawings which are considered as priority information and are not to be disclosed to the public. In addition, the bill of materials contain pricing information that is confidential to WHITE STAGG LLC for the manufacturing of the HALO smoke detector.

This request is being made to coincide with the initial submission of documents to the NRC for review and being made in confidence to the NRC as well.

Disclosure to the public of this information would cause substantial harm to the competitive position of WHITE STAGG LLC and cause irreversible damage to both the company's global financial position and manufacturing abilities. In addition, the bill of materials, if allowed to be disclosed, could easily be duplicated and used by competitors to buy up critical components which would impact our manufacturing and distribution capabilities.

Benjamin Bradley Stagg, CEO, WHITE STAGG LLC, is requesting that the bill of materials for the HALO smoke detector be withheld from public disclosure per (a)(4) **Trade secrets and commercial or financial information obtained from a person and privileged or confidential.**

Each drawings and page of the bill of materials shall be marked as follows:

**PROPRIETARY WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390**



Benjamin Bradley Stagg  
Chief Executive Officer and Co-founder  
WHITE STAGG LLC

8/18/15

Date

TRUE COPY

I, BRADLEY B. STAGG, do hereby swear or affirm that the  
Document owner (Principal)

attached document is a true copy of NRC REQUEST TO WITHHOLD FROM PUBLIC DISCLOSURE  
Description of document

and that this copy contains no alterations from the original.

[Signature]  
Principal's signature

Mecklenburg County, North Carolina

Signed and sworn to or affirmed before me this day by Bradley B Stagg  
Name of Principal

Witness my hand and official seal, this the 11<sup>th</sup> day of September, 2015.

(Official Seal)

**AMANDA YOUNG**  
Notary Public  
Gaston Co., North Carolina  
My Commission Expires Oct. 7, 2018

[Signature]  
Official signature of Notary

My commission expires: October 7, 2018