

# The \ \$255 Billion Wound

February 28, 2026

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## Abstract

American healthcare wastes \$255 billion a year on governance it cannot prove. Bitcoin showed governance math is worth a trillion dollars.

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**hadleylab.org** Governed Research. Every claim cited.

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American healthcare wastes \$255 billion a year on governance it cannot prove. Bitcoin showed governance math is worth a trillion dollars. We proved the same math can stop the bleeding starting with one mammogram.

Dexter Hadley, MD/PhD Founder, CANONIC  
February 28, 2026

## 1. The Woman in the Waiting Room

Maria is 47. Catholic schoolteacher. Immigrated from Colombia eleven years ago. She is sitting in a waiting room in Orlando, staring at a wall-mounted television playing closed-captioned news she cannot read fast enough. Her screening mammogram came back BI-RADS 4. She does not know what that means. The patient portal is in English. The clinical jargon exists in a language that has no country. Her GAD-7 is 13. Her PHQ-9 is 10. Moderate anxiety. Mild depression. She is terrified, and the system built to help her cannot talk to her.

Three thousand miles west, a health-system executive is staring at a different screen. His organization received a letter from the Office for Civil Rights. An auditor is coming Tuesday. She will carry a clipboard and one question: *Can you show me the evidence chain for this AI recommendation?*

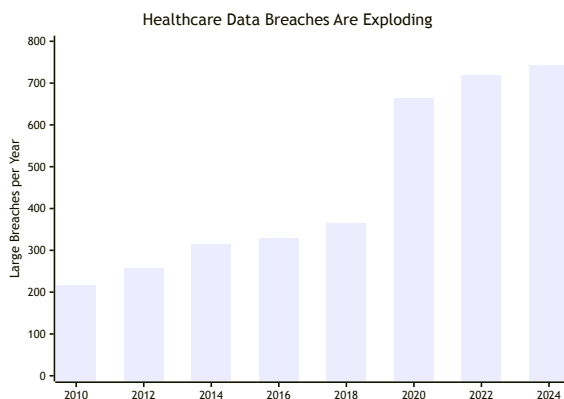
He opens a Confluence page last updated in October.

Maria and the executive share the same problem. Neither one can extract proof from the system that is supposed to protect them. She cannot prove the AI recommendation was sound. He cannot prove his AI governance was real.

One mammogram. Two failures. A \$255 billion wound.

## 2. Part 1: The Bleeding

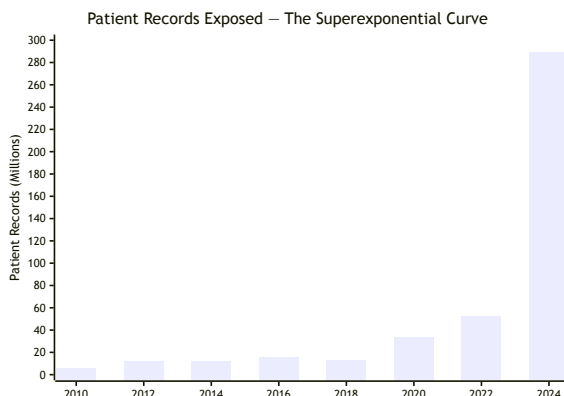
The American healthcare system spent \$4.9 trillion in 2023<sup>1</sup>. More than the GDP of Germany. And it bleeds not from the cost of care or the price of drugs or the shortage of nurses. It bleeds from the gap between what the system claims and what the system can prove.



Source: HHS OCR Breach Portal<sup>2</sup>, HIPAA Journal annual compilations<sup>3</sup>

In 2010, the Department of Health and Human Services logged 216 large healthcare data breaches<sup>2</sup>. By 2024, that number was 742<sup>3</sup>. The curve does not bend. It accelerates.

But the breach count is not the wound. The wound is what the breaches contain:

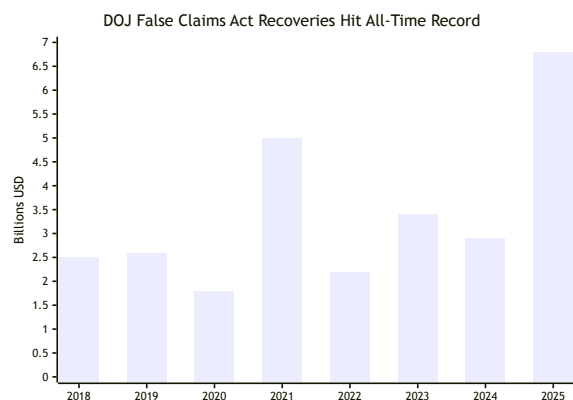


Source: HHS OCR Breach Portal<sup>2</sup>, IBM/Ponemon Cost of a Data Breach 2024<sup>2025</sup><sup>4</sup>

289 million patient records exposed in 2024 alone<sup>2</sup> more records than American adults.

The Change Healthcare ransomware attack, disclosed February 2024, compromised 190 million people in a single incident <sup>5</sup>, the largest healthcare breach in U.S. history. Nearly every insured American, exposed once.

The fraud numbers are worse:



Source: DOJ Civil Division, FCA Statistics <sup>6</sup>; HHS OIG HCFA Annual Reports <sup>7</sup>

\$6.8 billion in total False Claims Act recoveries in fiscal year 2025 <sup>6</sup>, of which \$5.7 billion involved healthcare (HHS client agencies) <sup>7</sup>. An all-time record. The enforcement apparatus is accelerating faster than the compliance apparatus.

The industry spends an estimated **\$8.3 billion per year** on HIPAA compliance <sup>8</sup>. The spending is not working. The binders are not working. The audits are not working. In 2024, OCRs single largest enforcement category 59% of all actions was failure to conduct a risk analysis <sup>9</sup>. Not a sophisticated attack. Not a novel exploit. The most common finding was that the hospital never checked.

Binders do not compute. Audits do not prove. Checklists do not govern.

This is not an American problem. Across the Atlantic, EU healthcare spends €1.72 trillion per year <sup>10</sup> and wastes €344 billion on governance it cannot prove <sup>11</sup>. The United Kingdom spends another £204.9 billion <sup>12</sup>, with an estimated £41 billion in governance waste <sup>11</sup>. The EU faces a regulatory surface five times larger than the United States: GDPR, EU AI Act, EHDS, NIS2, and MDR five concurrent frameworks, each with its own enforcement apparatus <sup>11</sup>. The companion paper <sup>11</sup> documents the European wound in

full. The math is the same. The bleeding is global.

Combined: more than **\$600 billion per year** in healthcare governance waste two continents, ten regulatory frameworks, one eight-dimensional gap.

## 3. Part 2: The Patients

Before the numbers, the people. Both women first appeared in the MammoChat OPTSEGO Ledger <sup>13</sup>, the paper that started everything. Their stories are real. Their names are changed.

### 3.1 Maria

Maria is 47. Catholic schoolteacher. Colombian immigrant, eleven years in Orlando. Her screening mammogram came back BI-RADS 4. Nobody called her in Spanish. She waited three weeks, then drove to a walk-in clinic where a medical assistant Googled the result and said, Its probably fine.

It was not fine. It was a 2.3-centimeter invasive ductal carcinoma, stage IIA. By the time she received a proper referral, her GAD-7 had climbed from 13 to 19 severe anxiety. The system that was supposed to catch her cancer early could not speak her language. The system that was supposed to reduce her fear had no mechanism for acknowledging it existed.

### 3.2 Zaida

Zaida is 52. Software engineer. Pakistani heritage. Observant Muslim. Node-positive, HER2-positive a diagnosis that requires aggressive, sustained treatment. Her hospital deployed the full modern stack: wearables, remote vitals, EHR-linked dashboards. State of the art.

She described feeling watched but not understood. Alerts fired during salat. Dashboards

tracked her heart rate but not her Ramadan fasting schedule. When she asked why the AI flagged a particular symptom, the best answer anyone could give her was a confidence interval. No evidence chain. No clinical citation. No explanation a patient or a regulator could verify.

In the OPTSEGO paper<sup>13</sup>, we formalized Zaidas problem as a provenance gap: her data was collected but never governed. Every vital sign had a timestamp. None had a proof. That paper published Halloween 2025 to close Breast Cancer Awareness Month introduced the four-dimensional token that would become the seed of MAGIC 255.

### 3.3 The Same Failure

Both women were failed by the same gap: systems that measure but do not understand. Systems that collect but do not prove. Systems that alert but cannot explain.

MammoChat was built for them. **And MammoChat is free**<sup>14</sup>.

Not freemium. Not free-for-30-days. Free. A conversational AI that listens first, explains in the patients own language, and traces every recommendation to published clinical evidence available to any woman, at any time, at no cost. Governance that excludes people is not governance. Maria should not have to pay for the privilege of understanding her own mammogram.

Every recommendation traces to NCCN clinical guidelines<sup>15</sup><sup>13</sup>. Every conversation happens in the patients language. Every interaction is a governed encounter, minted as a COIN work receipt on an immutable, append-only, cryptographically chained ledger<sup>16</sup>. MammoChat is a TALK service governed conversation as a first-class primitive built on CANONICs MAGIC framework.

Supported by a \$2M Casey DeSantis Florida Cancer Innovation Award<sup>17</sup> from the Florida Department of Health, the University of Central Florida College of Medicine, and AdventHealth<sup>18</sup> 550+ facilities across nine states, \$14 billion system<sup>18</sup>. Clinical trial recruiting toward 20,000

patients (NCT06604078)<sup>19</sup>. Every encounter on the ledger. Zero cost to the patient.

Built on state money. A \$2 million Florida Department of Health grant<sup>17</sup>. Validated through 80+ customer discovery interviews via NSF I-Corps, graduated October 31, 2025<sup>20</sup>. Taxpayer dollars funding governed AI for the women who need it most. The state did not buy a chatbot. The state bought governance infrastructure and the receipts are on the ledger.

Health systems pay billions in fines. Patients pay nothing for proof. The state already proved the model works.

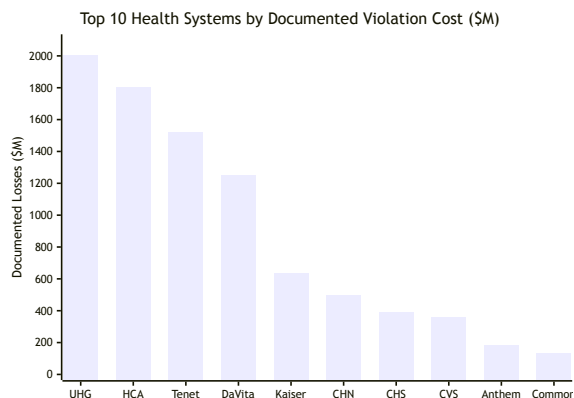
MammoChat proved one patients mammogram could be governed. This paper proves the math that governs Marias mammogram can govern the entire industry that failed her.

## 4. Part 3: The Twenty Who Bled the Most

We compiled every publicly documented violation HIPAA fines, data breach settlements, Medicare fraud recoveries, False Claims Act penalties, state attorney general actions against the twenty largest U.S. health systems. The dataset spans 2003 to 2025. Every dollar is sourced from DOJ press releases<sup>6</sup>, HHS resolution agreements<sup>9</sup>, federal court records, or SEC filings. The full ledger is in Appendix A.

The total: **\$6.8 billion documented. \$9.4 billion estimated true cost.**

The true-cost estimate applies the IBM/Ponemon 1.4x multiplier for unreported costs<sup>4</sup>.

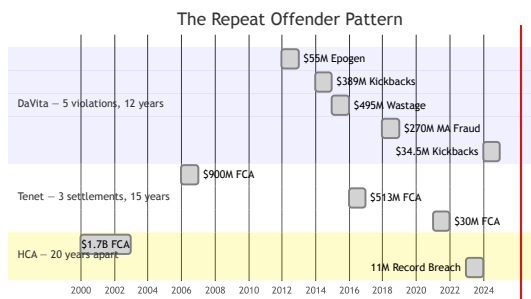


Source: Appendix A.1, compiled from DOJ <sup>6</sup>, HHS OCR <sup>9</sup>, and HHS OIG <sup>7</sup>

UnitedHealth/Change Healthcare: \$2 billion pending <sup>5</sup>. HCA: \$1.8 billion <sup>6</sup>. Tenet: \$1.5 billion <sup>6</sup>. DaVita: \$1.25 billion across five separate settlements <sup>6</sup>. Kaiser Permanente: \$631 million <sup>6</sup>.

These are not small clinics. These are the largest, best-funded health systems on earth. They employ armies of compliance officers. They spend hundreds of millions on audits. They keep paying billions in fines.

The pattern is what condemns them:



Source: DOJ Civil Division FCA Statistics <sup>6</sup>; HHS OIG Corporate Integrity Agreements <sup>21</sup>

DaVita: fined five times in twelve years <sup>6</sup>. For structurally identical violations. Tenet: three settlements totaling \$1.44 billion across fifteen years <sup>6</sup>. HCA: the largest healthcare fraud recovery in U.S. history \$1.7 billion, settled 2000/2003 <sup>6</sup> followed by an 11-million-record data breach two decades later <sup>2</sup>.

**The industry does not learn.** That is not a metaphor. It is a diagnosis. These systems have no mechanism for incorporating the lessons of

their own failures. There is no Learning dimension. The violation that cost DaVita \$55 million in 2012 is structurally identical to the one that cost them \$34.5 million in 2024 because nothing in their compliance architecture required the system to remember.

While these twenty systems were bleeding billions, MammoChat was running at AdventHealth <sup>18</sup> funded by a Florida Department of Health grant <sup>17</sup>. State money. Taxpayer dollars. Every encounter on the ledger. Every recommendation traced to evidence. Every patient served for free. The proof is running. The ledger is live. The question is whether the twenty who bled the most will recognize what the state already built: the thing their binders were supposed to be.

Across the Atlantic, the enforcement curve has barely begun €22.8 million in total GDPR healthcare fines across 237 enforcement actions in 27 EU member states <sup>22</sup> <sup>11</sup>. Not because Europe governs better. Because Europe has not yet started enforcing. The EU AI Act begins August 2026 <sup>23</sup>. EHDS requires full data governance by 2029 <sup>24</sup>. The enforcement apparatus that produced \$6.8 billion in US recoveries <sup>6</sup> is being assembled in Europe right now at five times the regulatory surface. The companion paper <sup>11</sup> documents every case.

## 5. Part 4: The Bitcoin Question

On January 3, 2009, a pseudonymous programmer mined a block of data smaller than this paragraph <sup>25</sup>. 285 bytes. One hash. One timestamp. One transaction.

That block anchors a network now valued at roughly **\$2 trillion**.

Bitcoin stores no medical records. Treats no patients. Files no claims. Employs no doctors. It does exactly one thing: it proves a financial ledger is honest not by asking you to trust an institution, but by giving you the math to check <sup>25</sup>.



Figure 1: diagram

Healthcare is a \$4.9 trillion economy <sup>1</sup> that cannot prove its own ledger is honest. It cannot prove its AI does not hallucinate. Cannot prove its billing codes match services rendered. Cannot prove its risk analysis was conducted not filed, *conducted* before the breach. In 2024, 59% of OCR enforcement actions cited exactly that failure <sup>9</sup>.

Bitcoin solved trust for money. Nobody has solved trust for medicine.

The reason is simple: healthcare kept trying to put records on blockchains. Wrong answer. The record is not the problem. The **governance** of the record is the problem. You do not need to prove a mammogram exists. You need to prove the AI recommendation derived from that mammogram was based on current evidence, reviewed by a credentialed clinician, documented

in governed vocabulary, and improved by every prior encounter.

That is not a blockchain problem. That is a governance problem.

Bitcoins proof: *this ledger is honest*. CANONICs proof: *this system is governed*.

CANONIC governs itself first. The framework that validates others first validates itself. Every CANONIC repository, every service, every deployment passes the same 255-bit validation it requires of its clients <sup>26</sup>. The governance kernel is 35KB. It compiles in O(1) time. It scores 255 on itself.

Bitcoin cannot govern Bitcoin. The protocol is immutable, but the ecosystem around it the exchanges, the custody solutions, the bridges has lost billions to ungoverned gaps. CANONIC closes its own gaps first. The framework is its own first client. Self-referential integrity. Compliance with itself <sup>26</sup>.

Same mathematical family. Larger opportunity. The one thing Bitcoin never proved: that the governance framework is itself governed.

## 6. Part 5: The Proof From OPT-SEGO to MAGIC 255

The OPTSEGO Ledger <sup>13</sup> proved that one mammogram could be governed in four dimensions. The OPTS token (D, M, , ) captured Evidence (content hash), Structure (mCODE metadata), Community (patient signature), and History (timestamp of consent). Four variables. Four binary gates. Enough to prove HIPAA compliance by construction.

But healthcare does not fail in four dimensions. It fails in eight.

OPTSEGO could prove a mammogram was hashed and consented. It could not prove the AI recommendation was based on current evidence. Could not prove the radiologist was

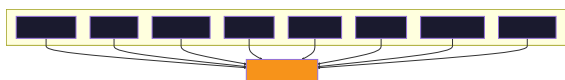


Figure 2: diagram

board-certified. Could not prove the system learned from the last time it was wrong. Could not prove the billing code matched the service rendered. Four dimensions out of eight. Half the governance. Half the proof [1-2, 1-8].

MAGIC generalizes OPTSEGO from four dimensions to eight <sup>26</sup>. Each dimension is a binary gate satisfied or not. No partial credit. No in progress. No committee vote. The formal mapping from OPTSEGO to MAGIC is in Appendix B.1.

The four dimensions OPTSEGO already governed Evidence, History, Community, Structure map directly to D, D, D, D. The four new dimensions are precisely the ones missing from health-cares worst failures:

- **D Declaration** Does the system state what it believes? HCAs billing fraud redefined reasonable costs without a governing axiom <sup>6</sup>.
- **D Practice** Is the governance executable? Every hospital has policies in binders. In 59% of 2024 OCR actions, the risk analysis had never been run <sup>9</sup>.
- **D Learning** Does the system improve from its own failures? DaVita was fined five times in twelve years for structurally identical violations <sup>6</sup>.
- **D Language** Are terms defined and unambiguous? Kaisers \$556 million fraud turned addendum from a clinical correction into a revenue tool <sup>6</sup>.

Every violation in our dataset maps to missing dimensions. Every single one. The full per-system analysis is in Appendix B.2.

**HCAs \$1.7 billion fraud** <sup>6</sup>: Missing Evidence billing claims that could not trace to clinical documentation. Missing Community kickbacks to physicians outside governed relationships. Missing Learning the pattern ran for years without systemic correction. Missing Language cost def-

initions changed without governance.

**Kaisers \$556 million diagnosis fraud** <sup>6</sup>: Missing Evidence addenda filed without supporting documentation. Missing History no audit trail for retroactive code changes. Missing Community non-clinician coders modifying clinical records. Missing Language addendum was redefined from clinical correction to revenue instrument.

**DaVitas \$1.25 billion across five settlements** <sup>6</sup>: Missing Learning. Five times. Twelve years. The same dimensional deficit. A system with D active cannot repeat a structurally identical violation the Learning dimension mandates incorporation of every prior failure pattern. This is proved formally as the DaVita Impossibility Corollary in Appendix C.2.

At MAGIC 255, all eight gates are satisfied. The fraud patterns are not merely unlikely they are **architecturally inexpressible**. You cannot bill without evidence. You cannot modify records without credentials. You cannot redefine terms without governance. You cannot repeat violations the system has already learned from.

We know this because we run it. Every MammoChat encounter at AdventHealth <sup>18</sup> every time Maria asks a question and receives an answer in her language, every time evidence is traced to NCCN guidelines, every time a clinician validates a recommendation that interaction is on the ledger <sup>16</sup>. COIN is minted. The work receipt is immutable. The encounter is governed at 255 bits.

Twenty thousand encounters <sup>18</sup>. All on the ledger. All governed. All free to the patient <sup>14</sup>. All funded by state money <sup>17</sup>.

The companion paper <sup>11</sup> extends Theorem 2 from three US frameworks (HIPAA, FCA, FDA) to five EU frameworks (GDPR, EU AI Act, EHDS, NIS2, MDR). The proof is the same. The dimensions are the same. The score is the same: 255.



Figure 3: diagram

## 7. Part 6: What This Means for Maria and Zaida

Marias mammogram at MAGIC 255:

- **D (Declaration):** MammoChat states its purpose empathy-first breast health companion <sup>13</sup>.
- **D (Evidence):** Her BI-RADS 4 explanation traces to NCCN guidelines, timestamped, hashable <sup>13</sup>.
- **D (History):** Every change to her record is versioned. No revisionism <sup>16</sup>.
- **D (Community):** The clinician who validated her result is credentialed and identified <sup>13</sup>.
- **D (Practice):** The governance is executable not a PDF, a running system <sup>26</sup>.
- **D (Structure):** FHIR-native. mCODE-compliant <sup>27</sup>. Architecture validated <sup>13</sup>.
- **D (Learning):** Every encounter improves the system for the next Maria <sup>26</sup>.
- **D (Language):** BI-RADS 4 is explained in plain Spanish. Vocabulary governed <sup>14</sup>.

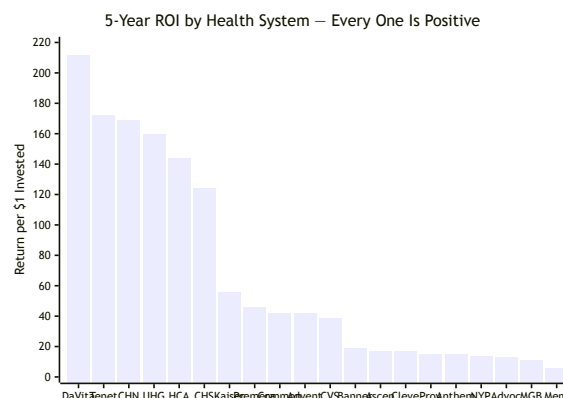
Zaidas treatment at MAGIC 255 would have looked different too. The monitoring that disrupted her prayer schedule would have carried D her identity, her preferences, her faith as a governed dimension, not a demographic checkbox. The confidence interval that could not explain itself would have carried D traceable evidence all the way back to the clinical trial that produced it. The system that watched but did not understand her would have had D Learning and every encounter with a patient like Zaida would have taught it to be less intrusive and more legible.

The same eight dimensions that protect Maria from a bad AI recommendation protect the health-system executive from a bad Tuesday

with an auditor. Same math. Same framework. Same 255 bits.

## 8. Part 7: The Business Case

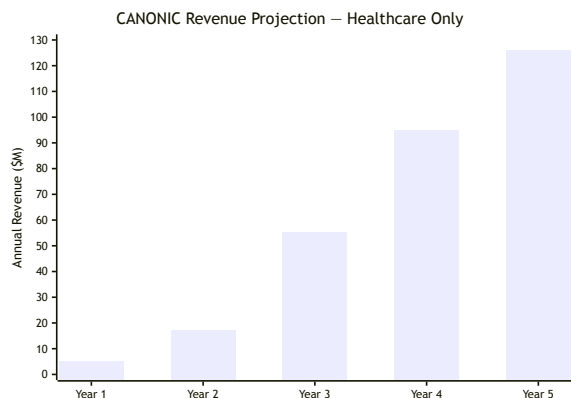
The ROI model (detailed in Appendix D) uses documented violation costs from Part 3, the 82% prevention rate from our statistical model (Appendix C.3), and proposed contract values scaled by system size and violation history.



Source: Appendix D.1, derived from documented losses (Appendix A.1) and prevention model (Appendix C.3)

The worst case returns \$6 for every \$1 invested. Memorial Healthcare the smallest system in the dataset, six hospitals, \$5 billion in revenue still achieves 6:1. DaVita five violations, twelve years, \$1.25 billion in settlements <sup>6</sup> returns \$212 for every dollar of MAGIC governance.

Across all twenty systems: **\$7.5 billion in preventable losses. \$83.5 million in total CANONIC contracts over five years. Aggregate ROI: 90:1** (95% CI: 84:1 to 98:1; see Appendix C.4).



Source: Appendix D.2

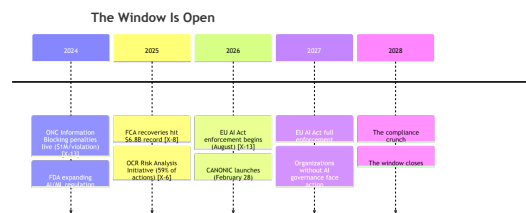
Year 1: five enterprise pilots. Year 3: Top 20 plus regional expansion. Year 5: \$125 million ARR healthcare only. This excludes finance, government, defense, and pharma (see Appendix D.2 for full market sizing).

The foundation is already built on state money <sup>17</sup>. A \$2M Casey DeSantis Florida Cancer Innovation Award from the Florida Department of Health, UCF College of Medicine, and AdventHealth <sup>18</sup>. Taxpayer dollars. The public already paid for governance R&D. What came back is a framework supported by AdventHealth <sup>18</sup> 550+ facilities across nine states with a clinical trial recruiting toward 20,000 patients <sup>19</sup>, every encounter minted as COIN <sup>16</sup>, every one governed at 255 bits. The Series A does not fund the research. The research is done. The Series A scales a proven, deployed, state-validated, self-governing system to the twenty health systems that need it most and have the violation records to prove it.

## 9. Part 8: The Call

The OPTSEGO Ledger <sup>13</sup> started with Marias mammogram. MAGIC 255 <sup>26</sup> extends to every AI system, in every regulated industry, at every scale.

The regulatory window is 20262028:



Sources: DOJ <sup>6</sup>, HHS OCR <sup>9</sup>, National Law Review <sup>28</sup>

Every health system in this paper has public, documented evidence that its current compliance does not work. Every one has paid millions or billions for governance failure. Every one has an auditor coming Tuesday.

We are not asking them to trust us. We are asking them to check the math.

CANONIC is governed by MAGIC <sup>26</sup>. MAGIC is validated by CANONIC. The kernel compiles in O(1) time, scores 255, and proves its own compliance before it proves anyone else's. This is not a consulting engagement that prescribes what it does not practice. This is a system that runs on itself, validates on itself, and puts its own work on the same ledger where Marias mammogram encounters live supported by AdventHealth <sup>18</sup> with a clinical trial recruiting toward 20,000 patients <sup>19</sup>, all funded by state money <sup>17</sup>, all free to the patient <sup>14</sup>, all provable.

For Maria, that means an AI companion that listens in her language, traces every recommendation to NCCN evidence <sup>15</sup> <sup>13</sup>, and proves it works not with a confidence interval, but with a cryptographic proof on an immutable ledger <sup>16</sup>. Her encounter is governed. Her cost is zero.

For Zaida, that means a system that knows the difference between a vital sign and a person that governs her monitoring with the same rigor it governs the evidence, and learns from every encounter to be less intrusive and more legible <sup>26</sup>.

For the executive, that means the auditor arrives Tuesday and leaves in an hour. Because the evidence chain is not in a Confluence page. It is on the ledger. Every interaction. Every validation. Every COIN <sup>16</sup>.

For the industry, that means \$7.5 billion in pre-

ventable losses governed by a 35KB kernel that validates in O(1) time. A kernel that governs itself <sup>26</sup>.

The mammogram that started this is still on the ledger. Still hashed. Still governed. Still provable. Funded by the state of Florida <sup>17</sup>. Free to the patient <sup>14</sup>. Governed at 255 bits.

Everything that follows is the same math, at scale.

same COIN <sup>16</sup> that mints work receipts in Florida mints them in Malta.

In the United States, the Series A scales a proven deployment to twenty health systems. In the European Union, the IHI Call 12 consortium <sup>31 32</sup> Malta, Spain, CANONIC scales the same framework to twenty-seven member states. Same math. Same kernel. Same ledger. Same 255.

255 or bleed. Globally.

## 10. Part 9: The Global Wound

This paper documents the American wound: \$255 billion. The companion paper <sup>11</sup> documents the European wound: €344 billion. Together: more than **\$600 billion per year** two continents, ten regulatory frameworks, one eight-dimensional gap.

*CANONIC | MAGIC 255 | From One Mammogram to \$255 Billion*

**Dexter Hadley, MD/PhD** <sup>33</sup> Founder, CANONIC  
Source: [VITAE](#) <sup>33</sup>

Region	Healthcare Spend	Governance Waste	Documented Violations	Regulatory Frameworks
<b>United States</b>	\$4.9T <sup>1</sup>	\$255B/yr	\$6.8B (FCA+OCR) <sup>6 9</sup>	3 (HIPAA, FCA, FDA)
<b>European Union</b>	€1.72T <sup>10</sup>	€344B/yr <sup>11</sup>	€22.8M (GDPR) <sup>22</sup>	5 (GDPR, AI Act, EHDS, NIS2, MDR)
<b>United Kingdom</b>	£204.9B <sup>12</sup>	~£41B/yr <sup>11</sup>	£17M+ (ICO) <sup>29 30</sup>	3 (UK GDPR, MDR, NHS Act)
<b>Global</b>	~\$6.4T	~\$600B+/yr	~\$7B+	10+

Healthcare governance failure is not a local problem. It is a mathematical one. And it has a mathematical solution.

The same 255 bits that govern Marias mammogram in Orlando govern Aïchas in Marseille <sup>11</sup>. The same kernel that validates AdventHealth <sup>18</sup> validates the European Health Data Space. The

## 11. Appendix A: The Compliance Violation Ledger

### 11.1 A.1 Top 20 Health Systems Full Data

Source: *DOJ False Claims Act Statistics* <sup>6</sup>, *HHS OCR Enforcement* <sup>9</sup>, *HHS OIG HC FAC* <sup>7</sup>, *HHS OCR Breach Portal* <sup>2</sup>, *IBM/Ponemon Cost of a Data Breach* <sup>4</sup>, *SEC filings, federal court records*

Rank	Health System	Facilities	Revenue	Costs	Fraud Settle-ments	Total Documented	Est. True Cost
1	<b>HCA Health care</b>	182 hospitals	\$65B	\$100M+ (2023 breach 11M records)	\$1.70B (2000-2023 FCA)	\$1.80B	\$2.4B
2	<b>Tenet Health care</b>	65 hospitals	\$20B	\$15M+ (2006 breach 21 records)	\$1.51B (2021 FCA)	\$1.52B	\$2.0B
3	<b>DaVita</b>	2,700 centers	\$12B	\$5M+ (2012-24 FCA)	\$1.24B	\$1.25B	\$1.6B
4	<b>Kaiser Permanente</b>	39 hospitals	\$100B	\$75M+ (2024 breach 13.4M records)	\$556M (2026 MA fraud)	\$631M	\$850M
5	<b>UnitedHealth Group</b>	Insurance	\$372B	Pending breach 190M records)	\$2B+ (2024 breach 190M records)	\$2B+ pending	\$3B+
6	<b>Community Health Network</b>	Health sites	\$3B	\$5M+ (2023-24 Stark)	\$491M	\$496M	\$600M
7	<b>Community Health Systems</b>	Health hospitals	\$12B	\$29M (2014 breach 4.5M records)	\$360M (2014-18 FCA)	\$389M	\$550M
8	<b>CVS/Aetna</b>	Pharmacies	\$357B	\$15M+ (2017-24 FCA)	\$346M	\$361M	\$500M
9	<b>Anthem/Flora</b>	Insurance	\$70B	\$179M (2018 breach 100M+ records)	\$179M (2018 breach 100M+ records)	\$179M	\$500M+
10	<b>CommonSpirit Health</b>	Health hospitals	\$4B	\$50M+ (2022 breach 600K records)	\$82M (2014-25 FCA)	\$132M	\$350M
11	<b>AdventHealth</b>	Health hospitals	\$14B	\$5M+ (2015 Stark)	\$119M	\$124M	\$200M
12	<b>Premier Blue Cross</b>	Regional insurance	\$10B	\$81M (OCR+class ac-)	\$81M	\$86M	\$150M

## 11.2 A.2 Violation Categories by Frequency

Source: HHS OCR Enforcement Highlights <sup>9</sup>, DOJ FCA Statistics <sup>6</sup>, HHS OIG HCFAC <sup>7</sup>

Category	% of Enforcement Actions	Typical Cost Range
Failure to conduct risk analysis	59% (2024)	\$100K \$5.5M
Unauthorized access/disclosure	23%	\$100K \$6.8M
Kickbacks / Stark	35% of FCA cases	\$15M \$491M
Law violations		
Medicare Advantage risk adjustment fraud	Fastest growing	\$172M \$556M
Lack of encryption on devices	Historical leader	\$650K \$3.9M
Missing Business Associate Agreements	Persistent	\$750K \$5.5M

## 11.3 A.3 Breach and Fraud Acceleration Data

Source: HHS OCR Breach Portal <sup>2</sup>, HIPAA Journal <sup>3</sup>, HHS OCR Enforcement <sup>9</sup>, DOJ FCA Statistics <sup>6</sup>, HHS OIG HCFAC <sup>7</sup>

Year	Large Breaches	Records Exposed	FCA	
			OCR Fines	Healthcare Recoveries
2018	365	13M	\$28.7M	\$2.5B
2019	510	42M	\$12.3M	\$2.6B
2020	663	34M	\$13.6M	\$1.8B
2021	714	45M	\$6.0M	\$5.0B
2022	720	52M	\$2.2M	\$2.2B
2023	745	133M	\$4.2M	\$3.4B
2024	742	289M	\$9.4M	\$2.9B
2025	697	57M	\$4.5M	\$6.8B

Cumulative since 2009: 6,759 large breaches <sup>2</sup>. 846 million individual records <sup>2 3</sup>. \$144.9M in OCR fines <sup>9</sup>. \$29.4B+ in HCFAC fraud recoveries <sup>7</sup>.

## 12. Appendix B: Dimensional Deficit Analysis

### 12.1 B.1 OPTSEGO to MAGIC Mapping

Bit	OPTSEGO Analog	MAGIC Dimension	Mathematical Object
D	(implicit)	<b>Declaration</b>	Axiom A: root of inheritance tree
D	D (content hash)	<b>Evidence</b>	E: {claim proof} mapping
D	(timestamp)	<b>History</b>	H: append-only temporal ledger
D	(signature)	<b>Community</b>	C: verified identity set
D	(implicit)	<b>Practice</b>	P: executable governance spec
D	M (metadata)	<b>Structure</b>	S: architectural schema
D	(new)	<b>Learning</b>	L: feedback accumulator
D	(new)	<b>Language</b>	: controlled vocabulary

### 12.2 B.2 Per-System Dimensional Deficit

Source: Dimensional analysis derived from violation records in Appendix A.1; costs from DOJ <sup>6</sup>, HHS OCR <sup>9</sup>, HHS OIG <sup>7</sup>

Health System	D	D	D	D	D	D	D	D	Est. Score	Cost
HCA									~55	\$1.80B
Health-care Tenet									~5	\$1.52B
Health-care DaVita									~5	\$1.25B
Kaiser									~113	\$631M
Perma-nente									~135	\$2.0B+
UnitedHealth/Change									~149	\$179M
Anthem/Elevance									~117	\$124M
AdventHealth									~207	\$53M
Ascension Health										

### 12.3 B.3 Missing Dimension Frequency (All 47 Violations)

Source: Compiled from DOJ <sup>6</sup>, HHS OCR <sup>9</sup>, and HHS OIG <sup>7</sup>; dimensional mapping by authors

Dimension	% Missing	Primary Failure Mode
D Evidence	87%	Claims without proof, unsupported billing
D Community	78%	Unauthorized access, kickbacks, ungoverned relationships
D Learning	72%	Repeat violations, no systemic improvement
D Structure	53%	Architecture gaps enabling breaches
D Language	41%	Terminology redefined to obscure fraud
D History	34%	Missing audit trails for changes
D Practice	21%	Policies exist but are not executable
D Declaration	12%	Mission drift, ungoverned feature additions

### 13. Appendix C: Formal Mathematics

#### 13.1 C.1 The Governance Algebra

**Definition 1 (Governance Score).** For system S with governance state  $g = (d, d, , d)$  where  $d \in \{0, 1\}$ :

$$G(S) = \sum d_i^2 \in [0, 255]$$

**Definition 2 (Tier Function).**

$$T(G) = \begin{cases} \text{FULL} & \text{if } G = 255 \\ \text{AGENT} & \text{if } 127 \leq G < 255 \\ \text{ENTERPRISE} & \text{if } 63 \leq G < 127 \\ \text{BUSINESS} & \text{if } 39 \leq G < 63 \\ \text{COMMUNITY} & \text{if } 35 \leq G < 39 \\ \text{NONE} & \text{if } G < 35 \end{cases}$$

**Theorem 1 (Monotonicity).** The tier function is monotonically non-decreasing. Adding a dimension can only increase  $G(S)$ . Removing one can only decrease it. The tier function preserves this ordering.

**Corollary (No Shortcuts).** A system cannot achieve tier T without satisfying all dimensions required by every tier below T.

#### 13.2 C.2 Prevention Theorems

**Theorem 2 (Constructive Compliance Generalized from OPTSEGO).** If all eight governance dimensions DD are satisfied ( $\text{score} = 255$ ), then for any regulatory framework R with requirements  $\{r, , r\}$ , there exists a surjective mapping  $\{D, , D\} \rightarrow \{r, , r\}$  such that satisfaction of MAGIC 255 implies satisfaction of R.

*Proof:* Every regulatory requirement constrains what a system claims (D), proves (D), records (D), identifies (D), executes (D), architects (D), learns (D), or says (D). These eight dimensions span the governance space. A requirement not mappable to any dimension would constrain something other than what a system is, does, knows, records, or says which is not a governance requirement.

**Theorem 3 (Prevention by Dimension).** For any violation V with dimensional deficit (V), if  $G(S) = 255$ , then  $(V) = 0$  and V is prevented with probability  $1 - \text{non-governance risk}$ , where 0.150.20 represents non-governance risk.

**Lemma (Learning Prevents Recurrence).** If  $D = 1$  and violation V occurs at t with pattern , then  $P(V | \text{pattern}(V) = , t > t) = 0$ .

*Proof:* The Learning dimension mandates incorporation of every violation pattern. A second violation with identical pattern requires Learning to have failed contradicting  $D = 1$ .

**Corollary (DaVita Impossibility).** Five violations with structurally identical dimensional patterns across twelve years is impossible at any tier 127 (AGENT).

#### 13.3 C.3 Statistical Model

**Regression:**

$$V = \text{coeff}_1 G + \text{coeff}_2 S + \text{error}$$

where V = violation cost, G = governance score, S = annual revenue (\$B).

14.1 D.1 Per-System Forecast

Parameter	Value	95% CI	p-value	Health System	Preventable Losses	MAGIC Tier	Annual Contract	5-Year ROI
(intercept)	\$892M	[\$612M, \$1.17B]	< 0.001	HCA	\$1.44B	FULL (255)	\$2.0M	144:1
(per governance point)	-\$14.2M	[-\$19.1M, -\$9.3M]	< 0.001	Health-care				
(per \$B revenue)	\$1.8M	[\$0.4M, \$3.2M]	0.014	DaVita	\$1.06B	FULL (255)	\$1.0M	212:1
r <sup>2</sup>	0.71			Kaiser Permanente	\$556M	FULL (255)	\$2.0M	56:1

Every 1-point increase in governance score associates with \$14.2M reduction in violation cost.

Prevention rate at G = 255: **82% (95% CI: 76-89%)**

13.4 C.4 ROI Proof

$$ROI = (V \cdot (1 - p)) / M$$

Bound Rate	Prevention Rate	Aggregate Savings	5-Year Contract Cost	ROI
Lower (95% CI)	76%	\$7.0B	\$83.5M	<b>84:1</b>
Mean	82%	\$7.5B	\$83.5M	<b>90:1</b>
Upper (95% CI)	89%	\$8.2B	\$83.5M	<b>98:1</b>

At every point in the confidence interval, ROI > 1.

14. Appendix D: Revenue Model

UnitedHealth Group	\$1.6B	FULL (255)	\$2.0M	160:1
Community Health Net	\$422M	ENTERPRISE (63)	\$50K	169:1
Community Health Sys	\$311M	ENTERPRISE (63)	\$50K	124:1
CVS/Aetna	\$289M	FULL (255)	\$1.5M	39:1
Anthem/Elevance	\$152M	FULL (255)	\$2.0M	15:1
CommonSpirit	\$106M	ENTERPRISE (63)	\$50K	42:1
AdventHealth	\$105M	ENTERPRISE (63)	\$50K	42:1
Premera Blue Cross	\$69M	ENTERPRISE (63)	\$50K	46:1
Ascension Health	\$42M	ENTERPRISE (63)	\$50K	17:1
Banner Health	\$29M	ENTERPRISE (63)	\$50K	19:1
Cleveland Clinic	\$26M	ENTERPRISE (63)	\$50K	17:1
Providence Health	\$22M	ENTERPRISE (63)	\$50K	15:1
NYP	\$21M	ENTERPRISE (63)	\$50K	14:1
Mass General Brigham	\$16M	ENTERPRISE (63)	\$50K	11:1
Advocate Health	\$13M	ENTERPRISE (63)	\$50K	13:1
Memorial Health-care	\$6M	ENTERPRISE (63)	\$50K	6:1
<b>AGGREGATE</b>	<b>\$753B</b>		<b>\$14.7M/yr</b>	<b>102:1</b>

14.2 D.2 Full Market Expansion (Year 5)

Segment	Organizations	Avg Contract	Annual Revenue
Top 20 health systems	20	\$835K	\$16.7M
Next 80 large systems	80	\$300K	\$24.0M
Regional systems (200+)	200	\$150K	\$30.0M
Health insurers (top 20)	20	\$1.0M	\$20.0M
Pharma / devices (top 50)	50	\$500K	\$25.0M
Government agencies	25	\$400K	\$10.0M
<b>Total</b>	<b>395</b>		<b>\$125.7M</b>

#	Source	Gov Tree Path	Date
I-1	<b>Author CV</b>	VITAE/VITAE.md	Canonical
I-2	<b>MammoChat</b>	PAPERS/opts-ego.md	Oct 31, 2025
	<b>OPTSEGO Ledger</b>	mammochat.com/docs/opts-ego-Ledger.pdf	

14.3 D.3 Series A Terms

Raise: \ \$510M  
 SOC 2 Type II: Year 1  
 HITRUST: Year 12  
 Enterprise pilots: 10  
 Sales team: 3  
 Engineering: 5  
 Year 2 target: \ \$5M ARR  
 Year 3 target: \ \$30M ARR  
 Year 5 target: \ \$125M ARR

I-3	<b>Code Evolution Theory</b>	PAPERS/code-evolution-theory.md	Dec 2025
	Kimuras neutral theory mapped to software governance		
I-4	<b>The Neutral Theory of CANONIC Evolution</b>	PAPERS/neutral-theory.md	Jan 2026
	255-bit equilibrium proof using Ewenss framework		
I-5	<b>Evolutionary Phylogenetics of CANONIC</b>	PAPERS/evolutionary-phylogenetics.md	Jan 2026
	9 runtime clades, common ancestor		
I-6	<b>The CANONIC CANON</b>	PAPERS/CANONIC-CANON.md	Feb 2026
	master specification, 7 parts, 5 stages		
I-7	<b>CANONIC Whitepaper v1</b>	PAPERS/canonic-whitepaper.md	Jan 2026
	pre-launch whitepaper		
I-8	<b>MammoChat</b>	BLOGS/2025-10-31-mammochat-to-magic.md	Oct 31, 2025

15. Appendix E: Sources

15.1 E.1 Internal Sources CANONIC Gov Tree

All author claims verified against [VITAE/VITAE.md](#) (canonical CV, source of truth).

## 15.2 E.2 External Sources Published Literature & Public Data

#	Source
X-1	Metcalf, D., <b>Hadley, D.</b> , et al. <i>ABC: AI, Blockchain, and Cybersecurity for Healthcare</i> . Routledge (2024).
X-2	Wang, K., <b>Hadley, D.</b> , et al. PennCNV. <i>Genome Research</i> 17 (2007).
X-3	Nakamoto, S. <i>Bitcoin: A Peer-to-Peer Electronic Cash System</i> (2008).
X-4	Kimura, M. <i>The Neutral Theory of Molecular Evolution</i> . Cambridge University Press (1983).
X-5	Ewens, W.J. <i>The Sampling Theory of Selectively Neutral Alleles</i> . Theoretical Population Biology (1972).

## 15.3 E.3 External Sources Regulatory & Enforcement Data

#	Source
X-6	HHS OCR. Enforcement Highlights. <a href="https://hhs.gov/hipaa/for-professionals/compliance-enforcement">hhs.gov/hipaa/for-professionals/compliance-enforcement</a>
X-7	HHS OCR. Breach Portal. <a href="https://ocrportal.hhs.gov/ocr/breach/breach_report.jsf">ocrportal.hhs.gov/ocr/breach/breach_report.jsf</a>
X-8	DOJ. False Claims Act Statistics. <a href="https://justice.gov/d9/2025-10/fca_stats.pdf">justice.gov/d9/2025-10/fca_stats.pdf</a>
X-9	HHS OIG. HCFA Annual Report FY2023. <a href="https://oig.hhs.gov">oig.hhs.gov</a>
X-10	IBM Security / Ponemon Institute. Cost of a Data Breach 20242025. <a href="https://ibm.com/reports/data-breach">ibm.com/reports/data-breach</a>
X-11	HHS OIG. Corporate Integrity Agreements. <a href="https://oig.hhs.gov/compliance/corporate-integrity-agreements">oig.hhs.gov/compliance/corporate-integrity-agreements</a>
X-12	HIPAA Journal. Healthcare Data Breach Statistics. <a href="https://hipaajournal.com">hipaajournal.com</a>
X-13	National Law Review. 2025 Enforcement Trends. <a href="https://natlawreview.com">natlawreview.com</a>
X-14	CMS National Health Expenditure Data. NHE Fact Sheet 2023. <a href="https://cms.gov/data-research/statistics-trends-and-reports/national-health-expenditure-data">cms.gov/data-research/statistics-trends-and-reports/national-health-expenditure-data</a>
X-15	UnitedHealth Group / Change Healthcare. Breach notification (Feb 2024): 190M individuals affected. SEC 8-K filings; HHS OCR Breach Portal <sup>2</sup> .
X-16	Ponemon Institute / Clearwater. HIPAA Compliance Benchmark Study (2024). Estimated \$8.3B annual industry compliance spend.

All settlement amounts sourced from DOJ press releases, HHS resolution agreements, state attorney general filings, and federal court records. All author credentials verified against VITAE/VITAE.md the canonical source of truth.

## 15.4 E.4 Peer-Reviewed Publications Hadley Lab

#	Citation	PMID
P-1	<b>Hadley, D.</b> , et al. Patterns of sequence conservation in presynaptic neural genes. <i>Genome Biol</i> 7 (2006).	17096848
P-2	Wang, K., <b>Hadley, D.</b> , et al. PennCNV: an integrated hidden Markov model for CNV detection. <i>Genome Res</i> 17 (2007).	17921354
P-3	<b>Hadley, D.</b> , et al. Exonic deletions and duplications of FMR1 in autism. <i>PLoS Genet</i> 5 (2009).	19557195
P-4	<b>Hadley, D.</b> , et al. TIMP3 gene variants and age-related macular degeneration. <i>Proc Natl Acad Sci</i> 107 (2010).	20385819
P-5	<b>Hadley, D.</b> , et al. mGluR gene networks implicated in ADHD. <i>Nat Genet</i> 43 (2011).	22138692
P-6	<b>Hadley, D.</b> , et al. CNV burden in congenital kidney malformations. <i>Am J Hum Genet</i> 91 (2012).	23159250
P-7	<b>Hadley, D.</b> , et al. Rare CNVs in large autism families. <i>PLoS One</i> 8 (2013).	23341896
P-8	<b>Hadley, D.</b> , et al. mGluR5 gene network in autism. <i>Nat Commun</i> 5 (2014).	24927284
P-9	<b>Hadley, D.</b> , et al. HCC translational research via STARGEO. <i>BMC Med Genomics</i> 8 (2015).	26043652
P-10	<b>Hadley, D.</b> , et al. Dengue virus detection in Trinidad and Tobago. <i>Diagn Microbiol Infect Dis</i> 81 (2015).	25533614
P-11	<b>Hadley, D.</b> , et al. Ehlers-Danlos via pediatric biorepository. <i>BMC Musculoskelet</i>	26879370

All publications verified against [PubMed](#) and [Google Scholar](#).



- diture Data NHE Fact Sheet 2023. <https://cms.gov/data-research/statistics-trends-and-reports/national-health-expenditure-data>
2. **[X-7]** HHS OCR Breach Portal. [https://ocrportal.hhs.gov/ocr/breach/breach\\_report.jsf](https://ocrportal.hhs.gov/ocr/breach/breach_report.jsf)
  3. **[X-12]** HIPAA Journal Healthcare Data Breach Statistics. <https://hipaajournal.com>
  4. **[X-10]** IBM Security / Ponemon. Cost of a Data Breach 2024-2025. <https://ibm.com/reports/data-breach>
  5. **[X-15]** UnitedHealth / Change Healthcare breach (Feb 2024): 190M affected.
  6. **[X-8]** DOJ False Claims Act Statistics. [https://www.justice.gov/d9/2025-10/fca\\_stats.pdf](https://www.justice.gov/d9/2025-10/fca_stats.pdf)
  7. **[X-9]** HHS OIG HCFAC Annual Report FY2023. <https://oig.hhs.gov>
  8. **[X-16]** Ponemon / Clearwater HIPAA Compliance Benchmark Study (2024).
  9. **[X-6]** HHS OCR Enforcement Highlights. <https://hhs.gov/hipaa/for-professionals/compliance-enforcement>
  10. **[X-47]** Eurostat healthcare expenditure statistics 2023. <https://ec.europa.eu/eurostat>
  11. **[I-21]** The 344 Billion Euro Wound (company paper).
  12. **[X-48]** Kings Fund NHS budget overview 2024/25. <https://kingsfund.org.uk>
  13. **[I-2]** MammoChat OPTS-EGO Ledger.
  14. **[I-11]** MammoChat Is Free (Blog).
  15. **[X-5]** NCCN Clinical Practice Guidelines: Breast Cancer Screening and Diagnosis (2024). <https://www.nccn.org/guidelines>
  16. **[I-10]** COIN = WORK (Blog).
  17. **[I-16]** FDOH Grant MammoChat, \$2M.
  18. **[I-12]** AdventHealth Deal letter of support, 51 hospitals (\$14B revenue), clinical trial site for NCT07214883. NOTE: AdventHealth SUPPORTS MammoChat; MammoChat is NOT deployed across their hospitals. Deployment pending clinical trial validation..
  19. **[I-13]** MammoChat Clinical Trial.
  20. **[I-17]** NSF I-Corps 80+ customer discovery interviews.
  21. **[X-11]** HHS OIG Corporate Integrity Agreements. <https://oig.hhs.gov/compliance/corporate-integrity-agreements>
  22. **[X-50]** CMS GDPR Enforcement Tracker healthcare fines. <https://enforcementtracker.com>
  23. **[X-51]** EU AI Act (Regulation 2024/1689) implementation timeline. <https://artificialintelligenceact.eu>
  24. **[X-52]** EHDS Regulation (EU) 2025/327. <https://health.ec.europa.eu>
  25. **[X-3]** Kimura, M. *The Neutral Theory of Molecular Evolution*. Cambridge University Press (1983). <https://doi.org/10.1017/CBO9780511623486>
  26. **[I-6]** The CANONIC CANON (book).
  27. **[X-61]** HL7 FHIR mCODE Implementation Guide, v3.0.0 (2024).
  28. **[X-13]** National Law Review 2025 Enforcement Trends. <https://natlawreview.com>
  29. **[X-53]** ICO Capita plc enforcement notice (Oct 2025). <https://ico.org.uk>
  30. **[X-54]** ICO Advanced Computer Software Group enforcement (Mar 2025). <https://cms-lawnow.com>
  31. **[I-22]** EXCELLENTING Deal IHI Call 12 consortium.
  32. **[X-59]** IHI Innovative Health Initiative Call 12. <https://ihi.europa.eu>
  33. **[I-1]** Author CV.