

EXHIBIT 4

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UNITED STATES OF AMERICA

CONSUMER PRODUCT SAFETY COMMISSION

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: CPSC Docket No. 12-2

In the Matter of : CPSC Docket No. 13-2

:

ZEN MAGNETS, LLC : Hon. Dean C. Metry

STAR NETWORKS USA, LLC :

:

Respondents. :

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DEPOSITION OF BOYD EDWARDS

Bethesda, Maryland

Tuesday, July 22, 2014

REPORTED BY:

CARMEN SMITH

1 received by the CPSC. 91 percent oppose the ban.
2 There are 5058 individuals who signed a petition
3 protesting the ban and 309 letters. That to me
4 represents a large body of objective evidence
5 that -- that the public support -- sees utility and
6 need for the product.

7 And comments extracted from those letters
8 and -- statements extracted from those letters and
9 comments, which are listed in appendix E, testify
10 the perception of the public of the educational
11 value of the magnets.

12 And so my answer to your question would be
13 no, that I think we can quantify through these --
14 through these surveys. One was an actual poll
15 conducted, and this is on page 15, and we haven't
16 discussed yet, page 15 on the right column, "A poll
17 conducted on July 10" and "11" "by Public Policy
18 Polling supplies further evidence of public
19 opposition to the ban. Of the 755 registered voters
20 who responded to the poll, 88 percent oppose a sales
21 ban to all ages, 6 percent support it, and 6" "were
22 undecided."

1 So that is scientific evidence of the
2 utility and value of the magnets, the two -- the two
3 statements that I set out to really base the report
4 on, which are listed on page 2. "Upon information
5 and belief, the Subject Products have low utility to
6 consumers," that's number 105, paragraph 105.

7 Number 106, "Upon information and belief,
8 the Subject Products are not necessary to
9 consumers."

10 I believe that these public statements,
11 this scientific poll that has a margin of error of
12 plus or minus 3-1/2 percent, do present objective
13 evidence.

14 MR. ARAGON: Could you read the question,
15 please?

16 (Record read by the court reporter as
17 follows: "Q: So I just want to confirm.
18 so the observations you've made on other
19 people using magnets is not, since it's
20 anecdotal, it's not really something that
21 can be objectively and scientifically
22 tested; is that right?")

1 at all?

2 A I read through the report on the poll.
3 And I saw a margin of error of 3-1/2 percent, which
4 says to me that they're doing their statistics. I
5 did not test to make sure the 3-1/2 percent is the
6 right margin of error.

7 Q Well, why don't -- what is your expertise
8 in scientific integrity in public polling?

9 A I have studied statistical physics and
10 published on percolation theory that we talked about
11 before is statistics.

12 Q So I'm asking you what -- how does that --
13 why should you be considered an expert in public
14 polling?

15 A I should not be considered an expert in
16 public polling.

17 Q Okay. So really the scientific integrity
18 that you're talking about from the polling is the
19 margin of error that you just happened to read on
20 the report --

21 A On the report.

22 Q -- done by the company that did the