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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. MORGAN REYNOLDS, on behalf of The United States of America	:	
Plaintiff,	:	ECF CASE
vs.	:	07 CIV 4612 (GBD)
SCIENCE APPLICATIONS INTERNATIONAL CORP., et al	:	January 28, 2008
Defendants.	:	

AFFIDAVIT

STATE OF NEVADA :

COUNTY OF CLARK :

JOHN LEAR, of full age, being duly sworn, deposes and says:

I.

1. I am 65 years of age, a retired airline captain and former CIA pilot with over 19,000 hours of flight time, over 11,000 of which are in command of 3 or 4 engine jet transports, have flown over 100 different types

of aircraft in 60 different countries around the world. I retired in 2001 after 40 years of flying.

2. I am the son of Learjet inventor, Bill Lear, and hold more FAA airman certificates than any other FAA certificated airman. These include the Airline Transport Pilot certificate with 23 type ratings, Flight Instructor, Flight Engineer, Flight Navigator, Ground Instructor, Aircraft Dispatcher, Control Tower Operator and Parachute Rigger.

3. I flew secret missions for the CIA in Southeast Asia, Eastern Europe, the Middle East and Africa between 1967 and 1983.

4. During the last 17 years of my career I worked for several passenger and cargo airlines as Captain, Check Airman and Instructor. I was certificated by the FAA as a North Atlantic (MNPS) Check Airman. I have extensive experience as command pilot and instructor in the Boeing 707, Douglas DC-8 and Lockheed L-1011.

5. I checked out as Captain on a Boeing 707 in 1973 and Captain on the Lockheed L-1011 in 1985.

6. I hold 17 world records including Speed Around the World in a Lear Jet Model 24 set in 1966 and was presented the PATCO (Professional Air Traffic Controller's Association) award for Outstanding Airmanship in 1968. I am a Senior Vice-Commander of the China Post 1, the American

Legions Post for “Soldiers of Fortune”, a 24 year member of the Special Operations Association and member of Pilotfor911truth.org.

7. I have 4 daughters, 3 grandchildren and live with my wife of 37 years, Las Vegas business woman Marilee Lear in Las Vegas, Nevada.

II.

8. No Boeing 767 airliners hit the Twin Towers as fraudulently alleged by the government, media, NIST and its contractors. Such crashes did not occur because they are physically impossible as depicted for the following reasons:

A. In the case of UAL 175 going into the south tower, a real Boeing 767 would have begun 'telescoping' when the nose hit the 14 inch steel columns which are 39 inches on center. The vertical and horizontal tail would have instantaneously separated from the aircraft, hit the steel box columns and fallen to the ground.

B. The engines when impacting the steel columns would have maintained their general shape and either fallen to the ground or been recovered in the debris of the collapsed building. One alleged engine part was found on Murray Street but there should be three other engine cores weighing over 9000 pounds each. Normal operating temperatures for these engines are 650˚C so they could not possibly have burned up. This is a photo of a similar sized engine from a McDonnell-Douglas MD-11 which impacted the ocean at a high rate of speed. You can see that the engine remains generally intact.(photo, http://www.cbsnews.com/stories/2003/03/27/world/main546355.shtml)

C. When and if the nose of an airplane came in contact with the buildings 14 inch by 14 inch steel box columns and then, 37 feet beyond, the steel box columns of the building core the momentum of the wings would have slowed drastically depriving them of the energy to penetrate the exterior steel box columns. The spars of the wing, which extend outward, could not possibly have penetrated the 14 inch by 14 inch steel box columns placed 39 inches on center and would have crashed to the ground.

D. The argument that the energy of the mass of the Boeing 767 at a speed of 540 mph fails because:

a. No Boeing 767 could attain that speed at 1000 feet above sea level because of parasite drag which doubles with velocity and parasite power which cubes with velocity.

b. The fan portion of the engine is not designed to accept the volume of dense air at that altitude and speed.

E. The piece of alleged external fuselage containing 3 or 4 window cutouts is inconsistent with an airplane that hit 14 inch steel box columns, placed 39 inches in center, at over 500 mph. This

fuselage section would be telescopically crumpled had it actually penetrated the building as depicted in the CNN video. It is impossible for it to have then re-emerged from the building and then fallen intact and unburned as depicted.

Figure 2-29 A portion of the fuselage of United Airlines Flight 175 on the roof of WTC 5.

F. The Purdue video fails because no significant part of the Boeing 767 or engine thereon could have penetrated the 14 inch steel columns and 37 feet beyond the massive core of the tower without part of it falling to the ground. The Purdue video misrepresents the construction of the core of the building and depicts unidentified parts of the airplane snapping the core columns which were 12"x36". The Purdue video also misrepresents what would happen to the tail when the alleged fuselage contacted the core. The tail would instantaneously separate from the empennage (aft fuselage). Further, the Purdue video misrepresents, indeed it fails to show, the wing box or center section of the wing in the collision with the core. The wing box is a very strong unit designed to hold the wings together and is an integral portion of the fuselage. The wing box is designed to help distribute the loads of the wings up-and-down flexing in flight.

G. My analysis of the alleged cutout made by the Boeing 767 shows that many of the 14-inch exterior steel box columns which are shown as severed horizontally, do not match up with the position of the wings. Further, several of the columns through which the horizontal tail allegedly disappeared are not severed or broken. In addition, the wing tips of the Boeing 767 being of less robust construction than the inner portions of the wings could not possibly have made the cookie-cutter pattern as shown in the aftermath photos. The wing tips would have been stopped by the 14 inch steel box columns and fallen to the ground.

H. The debris of the Boeing 767, as found after the collapse, was not consistent with actual debris had there really been a crash. Massive forgings, spars from both the wing and horizontal and vertical stabilizers, landing gear retract cylinders, landing gear struts, hydraulic reservoirs and bogeys oxygen bottles, a massive keel beam, bulkheads and the wing box itself cold not possibly have 'evaporated' even in a high intensity fire. The debris of the collapse should have contained massive sections of the Boeing 767, including 3 engine cores weighing approximately 9000 pounds apiece which could not have been hidden. Yet there is no evidence of any of these massive structural components from either 767 at the WTC. Such complete disappearance of 767s is impossible.

III.

9. My opinion, based on extensive flight experience both as captain and instructor in large 3 and 4 engine aircraft is that it would have been impossible for an alleged hijacker with little or no time in the Boeing 767 to have taken over, then flown a Boeing 767 at high speed, descending to below 1000 feet above mean sea level and flown a course to impact the twin towers at high speed for these reasons:

A. As soon as the alleged hijackers sat in the pilots seat of the Boeing 767 they would be looking at an EFIS (Electronic Flight Instrumentation System) display panel comprised of six large multi-mode LCDs interspersed with clusters of 'hard' instruments. These displays process the raw aircraft system and flight data into an integrated picture of the aircraft situation, position and progress, not only in the horizontal and vertical dimensions, but also with regard to time and speed as well.

Had they murdered the pilot with a box knife as alleged there would be blood all over the seat, the controls, the center pedestal, the instrument panel and floor of the cockpit. The hijacker would have had to remove the dead pilot from his seat which means he would have had electrically or manually place the seat in its rearmost position and then lifted the murdered pilot from his seat, further distributing blood, making the controls including the throttles wet, sticky and difficult to hold onto.

Even on a clear day a novice pilot would be wholly incapable of taking control and turning a Boeing 767 towards New York because of his total lack of experience and situational awareness under these conditions. The alleged hijackers were not 'instrument rated' and controlled high altitude flight requires experience in constantly referring to and cross-checking attitude, altitude and speed instruments. Using the distant horizon to fly 'visually' under controlled conditions is virtually impossible particularly at the cruising speed of the Boeing 767 of .80 Mach.

The alleged 'controlled' descent into New York on a relatively straight course by a novice pilot in unlikely in the extreme because of the difficulty of controlling heading, descent rate and descent speed within the parameters of 'controlled' flight.

Its takes a highly skilled pilot to interpret the "EFIS" (Electronic Flight Instrument Display) display, with which none of the hijacker pilots would have been familiar or received training on, and use his controls, including the ailerons, rudder, elevators, spoilers and throttles to effect, control and maintain a descent. The Boeing 767 does not fly itself nor does it automatically correct any misuse of the controls.

B. As soon as the speed of the aircraft went above 360 knots (=414 mph) indicated airspeed a "clacker" would have sounded in the cockpit. The 'clacker' is a loud clacking sound, designed to be irritating, to instantly get the attention of the pilot that he is exceeding the FAA-authorized speed of the aircraft. The clacker had no circuit breaker on September 11, 2001 although it does now simply because one or more accidents were caused, in part, by the inability to silence the clacker which made decision, tempered with reasoning, impossible because of the noise and distraction.

C. Assuming, however, that the alleged hijacker was able to navigate into a position to approach the WTC tower at a speed of approximately 790 feet per second the alleged hijacker would have about 67 seconds to navigate the last 10 miles. During that 67 seconds the pilot would have to line up perfectly with a 208 ft. wide target (the tower) and stay lined up with the clacker clacking plus the tremendous air noise against the windshield and the bucking bronco-like airplane, exceeding the Boeing 767 maximum stability limits and encountering early morning turbulence caused by rising irregular currents of air.

He would also have to control his altitude with a high degree of precision and at the alleged speeds would be extremely difficult.

In addition to this the control, although hydraulically boosted, would be very stiff. Just the slightest control movements would have sent the airplane up or down at thousands of feet a minute. To propose that an alleged hijacker with limited experience could get a Boeing 767 lined up with a 208 foot wide target and keep it lined up and hold his altitude at exactly 800 feet while being aurally bombarded with the clacker is beyond the realm of possibility. [NIST claims a descent from horizontal angle of 10.6 degrees for AA11 at impact and 6 degrees for UA175; see page 276 of 462 in NCSTAR 1-2].

That an alleged hijacker could overcome all of these difficulties and hit a 208 foot wide building dead center at the north tower and 23 feet east of dead center at the south tower is simply not possible. At the peak of my proficiency as a pilot I know that I could not have done it on the first pass. And for two alleged hijackers, with limited

experience to have hit the twin towers dead center on September 11, 2001 is total fiction. It could not happen.

IV.

10. No Boeing 767 airliner(s) exceeded 500 mph in level flight at approximately 1000 feet on 9/11 as fraudulently alleged by the government, media, NIST and its contractors because they are incapable of such speeds at low altitude.

11. One of the critical issues of the 'impossible' speeds of the aircraft hitting the World Trade Center Towers alleged by NIST as 443 mph (385 kts. M.6, American Airlines Flight 11) and 542 mph (470 kts. M.75, United Airlines 175) is that the V_D or dive velocity of the Boeing 767 as certificated by the Federal Aviation under 14 CFR Part 25 Airworthiness Standards; Transport Category Transports of 420 kts CAS (Calibrated Air Speed) makes these speeds achievable. This is unlikely.

12. The 'Dive Velocity' V_D is 420 knots CAS (calibrated airspeed)(483 mph). Some allege that this speed, 420 knots (483 mph) is near enough to the NIST alleged speeds that the NIST speeds 443 (385 kts.) mph and 542 mph (471 kts.), could have been flown by the alleged hijackers and are probably correct.

13. In fact V_D of 420 knots (483 mph) is a speed that is a maximum for certification under 14 CFR Part 25.253 High Speed Characteristics and has not only not necessarily been achieved but is far above V_{FC} (390 kts. 450 mph) which is the maximum speed at which stability characteristics must be demonstrated.(14 CFR 25.253 (b).

14. What this means is not only was V_D not necessarily achieved but even if it was, it was achieved in a DIVE demonstrating controllability considerably above V_{FC} which is the maximum speed under which stability characteristics must be demonstrated. Further, that as the alleged speed is considerably above V_{FC} for which stability characteristics must be met, a hijacker who is not an experienced test pilot would have considerable difficulty in controlling the airplane, similar to flying a bucking bronco, much less hitting a 208 foot target dead center, at 800 feet altitude (above mean sea level) at the alleged speed.

15. Now to determine whether or not a Boeing 757 or Boeing 767 could even attain 540 miles per hour at 800 feet we have to first consider what the drag versus the power ratio is.

> Drag is the effect of the air pushing against the frontal areas of the fuselage and wing and horizontal and vertical stabilizers. Drag also includes the friction that is a result of the air flowing over these surfaces. If there was no drag you could go very fast. But we do have drag and there are 2 types: induced and parasite. Assume we are going

really fast as NIST and the defendants claim, then we don't have to consider induced drag because induced drag is caused by lift and varies inversely as the square of the airspeed. What this means is the faster you go the lower the induced drag.

What we do have to consider is parasite drag. Parasite drag is any drag produced that is not induced drag. Parasite drag is technically called 'form and friction' drag. It includes the air pushing against the entire airplane including the engines, as the engines try to push the entire airplane through the air.

16. We have two other things to consider: induced power and parasite power.

Induced power varies inversely with velocity so we don't have to consider that because we are already going fast by assumption and it varies inversely.

Parasite power however varies as the cube of the velocity which means to double the speed you have to cube or have three times the power.

17. So taking these four factors into consideration we are only concerned with two: parasite power and parasite drag, and if all other factors are constant, and you are level at 800 feet and making no turns, the parasite drag varies with the square of the velocity but parasite power varies as the cube of the velocity.

What this means is at double the speed, drag doubles and the power required to maintain such speed, triples.

The airspeed limitation for the Boeing 767 below approximately 23,000 feet is 360 kts [414 mph] or what they call V_{MO} (velocity maximum operating).

That means that the maximum permissible speed of the Boeing 767 below 23,000 feet is 360 knots and it is safe to operate the airplane at that speed but not faster.

18. While the Boeing 767 can fly faster and has been flown faster during flight test it is only done so within carefully planned flight test programs. We can safely infer that most commercial 767 pilots have never exceeded 360 knots indicated air speed below 23,000 feet.

19. The alleged NIST speed of 443 mph (385 kts,) for American Airlines Flight 11 would be technically achievable. However the NIST speed of 542 mph (470 kts) for United Airlines Flight 175 which is 50 kts. above V_D is not commensurate with and/or possible considering:

(1) the power available,* **

(2) parasite drag (NAVAIR 00-80T-80 Aerodynamics for Naval Aviators

(3) parasite power (NAVAIR 00-80T-80 Aerodynamics for Naval Aviators

(4) the controllability by a pilot with limited experience. 14 CFR Part 25.253 (a)(b)

* http://www.ntsb.gov/ntsb/GenPDF.asp?id=DCA01MA063&rpt=fa
** http://www.content.airbusworld.com/SITES/Certification_Register/PDF-tcds/PW/PW4000_FAA.pdf

20. Therefore the speed of the aircraft, that hit the World Trade Center, as represented by NIST, particularly that of United Airlines Flight 175 is fraudulent and could not have occurred.

21. One more consideration is the impossibility of the PW4062 turbofan engines to operate in dense air at sea level altitude at high speed.

The Boeing 767 was designed to fly at high altitudes at a maximum Mach of .86 or 86/100ths the speed of sound. This maximum speed is called M_{MO}, (Maximum Mach Operating). Its normal cruise speed, however, is Mach .80 (about 530 mph) or less, for better fuel economy. (The speed of sound at 35,000 feet is 663 mph so 530 mph is Mach .7998 see http://www.grc.nasa.gov/WWW/K-12/airplane/sound.html.)

The fan tip diameter of the PW4062 which powered UAL 175 was 94 inches, over 7 feet in diameter making it, essentially a huge propeller.

This huge fan compresses enormous amount of air during takeoff to produce the thrust necessary to get the airplane off of the ground and into the air.

At high altitudes, in cruise, where the air is much thinner and where the engines are designed to fly at most of the time, the fan and turbine sections are designed to efficiently accept enormous amounts of this thin air and produce an enormous amount of thrust.

But at low altitudes, in much denser air, such as one thousand feet, where the air is over 3x as dense as at 35,000 feet, going much faster than Vmo or 360 knots, the air is going to start jamming up in the engine simply because a turbofan engine is not designed to take the enormous quantities of dense air at high speed, low altitude flight. Because of the much denser air the fan blades will be jammed with so much air they will start cavitating or choking causing the engines to start spitting air back out the front. The turbofan tip diameter is over 7 feet; it simply cannot accept that much dense air, at that rate, because they aren't designed to.

So achieving an airspeed much over its Vmo which is 360 knots isn't going to be possible coupled with the fact that because the parasite drag increases as the square of the speed and the power

required increases as the cube of the speed you are not going to be able to get the speed with the thrust (power) available.

It can be argued that modern aerodynamic principles hold that if an aircraft can fly at 35,000 ft altitude at 540 mph (~Mach 0.8), and for a given speed, both engine thrust and airframe drag vary approximately in proportion to air density (altitude), that the engine can produce enough thrust to fly 540 mph at 800 ft. altitude.

That argument fails because although the engine might be theoretically capable of producing that amount of thrust, the real question is can that amount of thrust be extracted from it at 540 mph at 800 ft.

22, To propose that a Boeing 767 airliner exceeded its designed limit speed of 360 knots by 127 mph to fly through the air at 540 mph is simply not possible. It is not possible because of the thrust required and it's not possible because of the engine fan design which precludes accepting the amount of dense air being forced into it.

23. I am informed that the lawsuit for which this affidavit is intended is in its preliminary, pre-discovery phase. I am further informed that actual eyewitness statements cast considerable doubt on the jetliner crash claims, irrespective of the media-driven impression that there were lots of witnesses. In fact, the witnesses tend, on balance, to confirm there were no jetliner crashes. I am also informed that information that will enable further refinement of the issues addressed in this affidavit will be forthcoming in discovery including, without limitation, the opportunity to

take depositions and to request relevant documentation (additional information). When that additional information is obtained, I will then be in a position to offer such other and further opinions as, upon analysis, that additional information will mandate.

24. At this stage, it cannot properly be assumed, much less asserted as factual, that wide-body jetliners crashed into the then Twin Towers of the WTC. Any declaration that such events occurred must be deemed false and fraudulently asserted, video images notwithstanding.

Notes:

1. On any chart plotting velocity versus either drag or thrust required or power required the parasite value rises sharply after 300 kts,

2. On any chart plotting velocity versus thrust or power required the curves rises sharply after 250 kts.

3. On any chart plotting velocity versus thrust required at sea level, the curve rises dramatically above 200 kts as does the curve for power required.

I swear the above statements to be true to the best of my knowledge.

/s/ John Olsen Lear

John Olsen Lear
1414 N. Hollywood Blvd.
Las Vegas, NV 89110-2006

Subscribed and Sworn to before
me this 24 day of January 2008.

/s/ Connie Jones
Notary Public/Appt Exp. 11/22/09
Certificate #94-2650-1

This is the page for the Boeing 767-200 Type Data Certificate information from which was used in this affidavit: <rgl.faa.gov/Regulatory_and_Guidance_library/rgMakeModel.nsf/0/15302e51a401f11a8625718b00658962/$FILE/A1NM.pdf >.

This is the page that shows how dive tests are conducted:

http://www.flightsimaviation.com/data/FARS/part_25-335.html

This is the page for the type data certificate for the engines used on UAL175

http://www.content.airbusworld.com/SITES/Certification_Register/PDF-tcds/PW/PW4000_FAA.pdf

This is the page that shows the type of engine used on the MD-11 that crashed into the ocean. (photo attached)

http://www.bst.gc.ca/en/reports/air/1998/a98h0003/01report/01factual/rep1_06_01.asp