PUBLIC RECORDS / WORKED EXAMPLE

Cyion: NIH grant eligibility and settlement evidence

Funding diligence

Prepared by Dossier Editorial | November 16, 2026

EVIDENCE SOURCES	EVIDENCE CHECKED	PUBLISHER INSTITUTIONS
4	2026-11-16	2

SECTIONS	READER QUESTIONS	REVIEW SCOPE
8	5	Public records

EVIDENCE CHECKED	2026-11-16
EDITION	1 | Public-source research
ARTICLE	dossierplus.ai/blog/cyion-nih-sbir-sttr-grant-eligibility-evidence

IMPORTANT USE NOTE

Prepared by Dossier Editorial with AI assistance from public records. This educational document review does not claim a live Dossier investigation, access to private grant or personnel files, government confirmation of payment, human approval or legal review. It is not a determination of current grant eligibility or legal advice.

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

PART 01

The decision in brief

No. An award record establishes that funding was awarded; it does not independently prove that every eligibility certification was accurate or that all conditions remained satisfied. Cyion Technologies LLC agreed to pay $528,335.74 plus interest to resolve allegations involving three NIH grants and its principal investigator's outside employment. The agreement does not admit liability, adjudicate the allegations or establish that the settlement money has been received.

Publication date: November 16, 2026. Historical event dates are identified separately. This PDF and the article use the same structured source selection and findings.

PART 02

Executive summary: an award and eligibility answer different questions

The practical question for a funder, business partner or reviewer is whether an award supports the particular claim being made about a company. A grant can be real while a certification associated with it is disputed. Keep the award, the applicable condition and the evidence of compliance as separate findings.

- Documented outcome: a signed settlement addresses the United States' eligibility allegations concerning two STTR awards and one SBIR award. DOJ announced the resolution on November 13, 2026.
- Unresolved merits: Cyion did not admit liability. The reviewed agreement summarizes the government's position but does not supply the original award terms, personnel evidence or a court finding.
- Payment boundary: four scheduled principal installments total $528,335.74, with interest in addition. A payment obligation is not a receipt. [S1] [S2]

This walkthrough checks the public settlement, its announcement and current NIH guidance on November 16. The historical award periods, settlement dates and this article's publication date are kept separate.

PART 03

Identify the company, all three grants and the relevant dates

The settling party is Cyion Technologies LLC, identified in the agreement as based in Pleasanton, California. Use that exact party name and the grant identifiers below. The agreement does not provide a court case number, and this review does not independently verify corporate registration, ownership or present grant eligibility. [S1]

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

RECORD OR DATE	WHAT THE ORIGINAL AGREEMENT IDENTIFIES	WHAT THE RECORD DOES NOT ESTABLISH
2017; drawdowns through 2019	STTR awards 1R41EB022439-01A1 and 1R41NS102026-01, received from NIH.	The underlying award documents, each drawdown amount and contemporaneous eligibility evidence are not attached. [S1]
2023; drawdowns through 2024	SBIR award 1R43HL170918-01, received from NIH.	A later award does not resolve the alleged accuracy of its application or drawdown certifications. [S1]
November 10 and 13, 2026	Visible signature dates; the last dated signature is November 13. Paragraph 17 makes the agreement effective upon the last signature.	Visible signatures are not a court-entered judgment or an independent authentication of the signing process. [S1]

DOJ's November 13 announcement identifies the same two STTR awards and one SBIR award. Its closing qualification says the resolved claims remain allegations and liability has not been determined. The announcement and attached agreement come from the same government source; they are not independent corroboration of the underlying employment facts. [S2]

PART 04

Read the allegation against the award terms that actually applied

Recital B states the United States' contention that Cyion falsely certified eligibility when applying and each time it drew funds because its principal investigator held outside full-time employment contrary to the terms of these awards. That is the government's allegation. Recital C preserves Cyion's non-admission and the government's position that its claims are well founded. [S1]

A defensible review would match each certification to its date, the exact award condition, the investigator's role and the employment or effort evidence for that period. It would also check any written approval that modified a requirement. A company biography or a current job title cannot, on its own, resolve what happened during a historical award period.

NIH's March 2026 guidance illustrates why program and role matter. In its multiple-investigator section, a Phase I SBIR Contact PD/PI generally must spend more than half their employment time at the small business; other investigators in that configuration do not have the same requirement. Written deviations are possible under specified circumstances. For Phase I and II STTR projects in that section, employment by the small business is not required, but the contact investigator needs a formal appointment or commitment; each investigator has an effort requirement. [S3]

That current guidance is context, not a retrospective ruling on Cyion's 2017 and 2023 awards. The reviewed settlement does not establish the awards' investigator configuration, reproduce their conditions or identify approved exceptions. Neither a blanket ban on every outside affiliation nor an inference that Cyion must have qualified follows from this comparison.

Start with the Notice of Award and the terms it incorporates. NIH describes that notice as the legally binding award document containing or referencing the conditions and funding obligations. Its official repository is eRA Commons. This public-source review did not access a recipient's account or obtain Cyion's three notices. [S4]

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

PART 05

Record the agreed payment separately from money received

Paragraph 1 sets principal at $528,335.74 and annual interest at 5%, accruing from August 16, 2026 on the unpaid settlement amount. The schedule is precise enough to preserve as a follow-up checklist. [S1]

SCHEDULED DATE	PRINCIPAL INSTALLMENT	EVIDENCE NEEDED TO MARK IT RECEIVED
December 31, 2026	$176,094.30, plus interest	Dated confirmation of receipt and allocation to this settlement. [S1]
March 31, 2027	$117,413.81, plus interest	Reconcile principal, interest and any earlier payment. [S1]
June 30, 2027	$117,413.81, plus interest	Confirm the outstanding balance and receipt date. [S1]
August 15, 2027	$117,413.82, plus interest	Obtain final reconciliation or equivalent confirmation of satisfaction. [S1]

Editorial arithmetic: $176,094.30 + $117,413.81 + $117,413.81 + $117,413.82 = $528,335.74. This checks the principal schedule only. It is not a calculation of the current balance or total interest paid.

November 16 is before the first scheduled installment. That does not prove that nothing has been paid: paragraph 1 permits prepayment and contains acceleration terms for specified transactions. This review has not verified a payment, a triggering transaction or a revised schedule. It makes no finding that an installment is overdue. [S1]

Paragraph 2 conditions the government's specified monetary release on receipt of principal and interest, subject to reserved claims in paragraph 3. The agreement therefore supports a conditional resolution of defined conduct, not a verified receipt, universal release or current eligibility clearance. Reservations of rights, including administrative remedies, do not establish that those remedies were exercised. [S1]

PART 06

Findings: what can be said now, and what would change it

- Supported: the agreement identifies three NIH awards, describes the government's allegations and creates payment obligations. The existence of the awards is part of the record, not something this review disputes.
- Important qualification: the settlement expressly avoids an admission of liability. No adjudication of the employment allegation is established by these documents.
- Missing for an independent eligibility finding: the original notices and incorporated terms, applications and certifications, period-specific appointment and employment records, effort evidence and any authorized exception.
- Missing for a payment finding: a dated receipt or reconciliation attributable to this agreement. A settlement headline, future due date or absence of an easily found receipt cannot substitute for that evidence.

The original DOJ page and agreement were checked on November 16. A targeted search of original government and company sources did not identify a later amendment or payment confirmation in the

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

material reviewed. This was a bounded public-source check, not a complete court, recipient or government accounting search. The conclusion remains limited to the reviewed documents.

PART 07

Decision tree: does the evidence support the eligibility claim?

1. DOES THE RECORD MATCH THE LEGAL PARTY, PROGRAM, AWARD NUMBER AND PERIOD?

- If established: Retain those identifiers together and move to the governing conditions.
- If unresolved: Hold the claim as unmatched. A similar company name or generic grant announcement is insufficient.

2. DO YOU HAVE THE APPLICABLE NOTICE OF AWARD, INCORPORATED TERMS AND ANY WRITTEN EXCEPTION?

- If established: Identify the exact condition and the investigator role to which it applies.
- If unresolved: Record a terms gap. Do not apply a current policy excerpt automatically to an earlier award.

3. DOES CONTEMPORANEOUS EVIDENCE ADDRESS THE CONDITION AT EACH RELEVANT CERTIFICATION DATE?

- If established: Compare the evidence with the stated condition and document contrary material.
- If unresolved: Keep compliance unresolved. An award or settlement is not a substitute for those underlying records.

4. IS THE CLAIMED OUTCOME A SETTLEMENT PAYMENT OR COMPLETE RELEASE?

- If established: Check the agreement's scope and conditions, then seek receipt and reconciliation evidence.
- If unresolved: State the narrower finding: awarded funding, an allegation or an agreed obligation, as supported.

PART 08

Reproduce the review in a Dossier

- Frame one question: for example, does this award establish compliance with the principal-investigator condition during the drawdown period? Avoid a broad label such as trustworthy grantee.
- Create a source register for the signed agreement, official announcement and policy records. Keep the original files, retrieval dates, document versions and page or section anchors.
- Build a chronology with one row per award and certification period. Separate the allegation, Cyion's non-admission, agreement effectiveness, scheduled payment dates and actual receipt evidence.
- Create a condition-to-evidence table. Record the applicable terms, required role or effort, available proof, contrary material and missing documents. Leave unreviewed employment facts unresolved.
- Write findings at the level the sources support. Use alleged for the disputed certifications, agreed for scheduled obligations and received only when a reliable receipt is available.
- Export the report with its source links and open questions. Update the conclusion when an original award document, approved exception, amendment or payment confirmation changes the evidence.

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

This is a reproducible editorial workflow using public sources. It does not represent a completed platform investigation, a private personnel review or a government determination. Any later use of nonpublic award or employment records would require appropriate access and authority.

PART 09

Follow-up evidence worth collecting

The most useful next record for eligibility is an original award package with the relevant historical condition and any approved exception. For the settlement outcome, it is a dated payment confirmation or amendment that changes the schedule or release analysis. Neither a repeated press summary nor an unverified social profile resolves those questions.

Keep the three grant identities intact when following up. An answer about one STTR award does not establish the position under the separate SBIR award. Recheck the period and scope before carrying a finding forward.

PART 10

Questions readers ask

DOES RECEIVING AN NIH AWARD PROVE THAT EVERY ELIGIBILITY REQUIREMENT WAS SATISFIED?

It establishes an award, not independent verification of every certification or later condition. Cyion's agreement demonstrates the distinction: it identifies awards while resolving disputed eligibility certifications without an admission of liability. [S1]

WERE TWO OR THREE GRANTS INVOLVED IN THE CYION SETTLEMENT?

Three: STTR awards 1R41EB022439-01A1 and 1R41NS102026-01, plus SBIR award 1R43HL170918-01. The agreement links the STTR awards to 2017–2019 and the SBIR award to 2023–2024. [S1]

DOES NIH FORBID ALL OUTSIDE EMPLOYMENT FOR EVERY SBIR OR STTR INVESTIGATOR?

Do not infer that blanket rule from this settlement. NIH's current multiple-investigator guidance distinguishes program and investigator role. The applicable award conditions and any written exception must be checked for the period under review. [S3]

DID CYION ADMIT FRAUD OR RECEIVE A COURT JUDGMENT?

The settlement expressly states that it is not an admission of liability. DOJ says liability was not determined. These reviewed documents do not establish a court-entered judgment. [S1] [S2]

HAS THE $528,335.74 SETTLEMENT BEEN PAID?

Receipt was not verified in this review. The agreement schedules four principal installments from

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC

December 31, 2026 through August 15, 2027, plus interest, and permits prepayment. Those terms establish an obligation, not a current payment status. [S1]

PART 11

Linked source register

Titles with a recorded URL link to that source. Entries without a URL identify retained material but do not open an original file. For any court or business record being used in litigation, obtain a certified copy directly from the clerk or filing authority and preserve the retrieval date.

S1 **Cyion Technologies LLC settlement agreement**
Original signed settlement agreement. Anchor: PDF pp. 1–3: recitals B–C, payment schedule and conditional release; pp. 3–4: reserved claims; pp. 8–9: effectiveness and signatures. All nine scanned pages visually reviewed. Allegations and non-admission preserved. The agreement is not a payment receipt or court judgment. · retrieved 2026-11-16

S2 **DOJ announces the Cyion grant settlement**
Original agency announcement. Anchor: November 13, 2026; opening three paragraphs and closing liability qualification. Same government source as S1. Establishes announcement context, not independent corroboration of employment facts or payment. · retrieved 2026-11-16

S3 **NIH Grants Policy Statement: SBIR/STTR eligibility**
Official current policy guidance. Anchor: March 2026 revision; section 18.5.2.4, Multiple Program Director/Principal Investigator Applications and Awards. Used to explain program and role distinctions. Not treated as the terms governing Cyion's historical awards. · retrieved 2026-11-16

S4 **NIH Grants Policy Statement: Notice of Award notification**
Official award-document guidance. Anchor: March 2026 revision; section 5.1, Notice of Award definition and eRA Commons repository. Explains which document contains or incorporates award terms. No recipient account or Cyion Notice of Award was accessed. · retrieved 2026-11-16

Generated by Dossier · Doc ID DSR-CLLD-EGMF-KGYS · Seal E65E5321A665 · SHA-256 3F470DC331ECAF7C · Issued 2026-11-16 17:12 UTC