

CONSTITUTIONAL MEMORY S.A.

European AI-Governance Alliance · BlackVault™ Sovereign AI Infrastructure

FORMAL DISCLOSURE

March 16th, 2026



VALLE
CONSTITUCIONAL
MÁLAGA



BLACKVAULT



EUROPEAN
AI-GOVERNANCE
ALLIANCE



CONSTITUTIONAL
MEMORY.AI

www.constitutional-memory.ai

"AI sovereignty is not secured at the model layer. It is secured at the governance and memory layer. BlackVault™ architecture has been developed as a governed AI-memory framework for public-sector, enterprise and regulated-industry deployment under full EU compliance. To support structured implementation at scale, the 'European AI-Governance Alliance' is now under development."

- Greg Malpass, Founder and CEO, Constitutional-Memory



Málaga: Where a Valley Becomes a Constitution



The Constitutional Memory | European AI-Governance Alliance | Constitutional Valley (Málaga) initiative is an independent research and innovation effort aimed at exploring the creation of trusted digital infrastructure for data sovereignty and AI governance.

The entities, institutions, and individuals mentioned in this project — including the University of Málaga, Málaga TechPark, and selected potential Alliance partners — are included for reference and illustrative purposes only. Their mention does not imply commitment, endorsement, or partnership.

This documentation is publicly shared to foster collaboration and discussion. While the ideas and potential partners are visible, detailed implementation and technical execution remain proprietary. Publishing early establishes the project's origin and timeline, emphasising our role as the initial innovators. This ensures that anyone exploring similar concepts recognises the project's authorship and vision, while enabling constructive engagement with the ecosystem.

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Constitutional Valley (Málaga) · 16 March 2026

EUROPEAN
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Málaga: Where a Valley Becomes a Constitution

There are places that grow into their future quietly, almost without noticing. And then there is Málaga — a city that has spent the last decade reinventing itself so quickly, so confidently, that the rest of Europe is only now beginning to understand what has happened on this stretch of Andalusian coast.

What began as a Mediterranean tech outpost has become something far more interesting: a living laboratory for cybersecurity, digital trust, and the governance of intelligent systems. Málaga TechPark now hosts one of Europe's densest clusters of cybersecurity companies. The National Cybersecurity Institute chose Málaga as a strategic node. The European Union's own cybersecurity ecosystem increasingly looks south, toward Andalusia, for talent and infrastructure. Even the city's universities have quietly built deep expertise in cryptography, secure systems, and digital identity.

In other words: Málaga already behaves like a constitutional capital — it just hasn't been named one yet.

That is the opportunity of “*Valle Constitucional*”. Not a valley of startups. Not a valley of apps. But a valley of memory, governance, and public-good intelligence — a place where Europe can prototype the systems that will protect its democratic identity in the age of AI.

Imagine a region where:

- Cybersecurity talent becomes the backbone of civic trust
- AI governance research shapes how institutions remember, decide, and evolve
- Digital sovereignty is not a slogan but a lived infrastructure
- Citizens, engineers, & institutions co-create the memory systems that future generations will rely on

“The question is not whether AI governance infrastructure will exist. The question is whether it will be owned by European institutions that answer to European law and European values — or by US corporations that answer to their shareholders and the US CLOUD Act.”

— Greg Malpass, Founder & CEO, Constitutional Memory SA.

1. ABOUT THE INITIATIVE

Constitutional Memory S.A. is an independent research and innovation initiative developing sovereign AI governance infrastructure for European enterprise. Its flagship product, *BlackVault*™, is a multi-platform middleware layer that enables enterprises to benefit from AI at full capability while ensuring that no employee data, no client data, and no institutional memory ever leaves their controlled environment.

The Constitutional Valley (Málaga) initiative positions Málaga as the institutional home and European anchor for this infrastructure — the place where the governance standard is defined before others can replicate it.

The initiative has been in development for three years. Its technical documentation — exceeding 1,250 pages of enterprise-grade specification — has been independently assessed by Anthropic Claude as Exceptional: Enterprise Grade.

BUILT ON THREE PILLARS



<p>1. Technical Legitimacy Enterprise-grade architecture developed with leading experts in AI, cybersecurity, and digital infrastructure. Independently validated as exceptional.</p>	<p>2. Political Awareness Aligned with EU AI Act compliance requirements and European sovereign digital priorities, including the Digital Markets Act framework.</p>	<p>3. Public Transparency Research, insights, and strategic concepts shared openly to foster understanding, dialogue, and collaboration — including this disclosure.</p>
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2. CURRENT STATUS — MARCH 2026



The initiative has entered its public disclosure phase. The following reflects the current state of development and active engagement:

<p>Live Public Website Page</p>	<p>www.constitutional-memory.ai — with full Official Disclosure, project context, and disclaimer language published as of 10th March 2026</p>
<p>Active dialogue — AI Governance Leaders</p>	<p>Engagement underway with figures including the Chairmen of leading Spanish & European enterprises, EU Commissioners responsible for the EU AI Act & Digital Markets Act, and leading AI governance academics at Oxford University and UC Berkeley</p>
<p>Active dialogue — Andalusian Ecosystem</p>	<p>Engagement with regional government representatives including ADA (Agencia Digital de Andalucía), ANIA, and the University of Granada's DaSCI institute</p>
<p>Active dialogue — European AI-Infrastructure Enterprises</p>	<p>Outreach to senior leadership of European sovereign AI infrastructure companies including Telefónica, T-Systems, OVHCloud, Thales, Indra, and Capgemini</p>
<p>Technical validation</p>	<p>1,250+ pages of enterprise-grade specifications independently assessed as Exceptional — Enterprise Grade (Anthropic Claude)</p>
<p>Intellectual foundation</p>	<p>Three years of development; supported by six books/literary works on personal sovereignty and personal development by the Founder</p>
<p>First-Mover Statement</p>	<p>This public disclosure establishes Constitutional Memory S.A. as the originating innovator & flagship of the Constitutional Valley concept. Detailed technical implementation and execution remain proprietary.</p>

3. THE ROLE OF MÁLAGA'S INSTITUTIONS

Málaga TechPark and the Universidad de Málaga are referenced in Constitutional Memory's public materials as part of the institutional ecosystem within which this initiative has developed. This is accurate and factual: the project has been presented to both institutions on multiple occasions since November 2024, and the TechPark has been engaged in dialogue through Clara Gálvez.

This reference does not imply, and is not intended to imply any commitment, formal partnership, or endorsement. The published disclaimer makes this explicit.

Constitutional Valley is not a project being offered to Málaga for approval. It is a project that has chosen Málaga — on the basis of its demonstrable strengths in cybersecurity, digital trust, and governance infrastructure — as the natural European anchor for what it intends to build.

The opportunity for Málaga's institutions to move from reference to active participation — as co-founders of Constitutional Valley, as academic partners in governance research, as local anchors in the European AI-Governance Alliance — remains open and is genuinely significant.

4. HOLDING WEBPAGE — AS PUBLISHED March 10th 2026 (Hosted by www.ThinkBigPartnership.com)



**"AI sovereignty is not secured at the model layer.
It is secured at the governance and memory layer."**

www.constitutional-memory.ai

From a start-up providing Individual Users Hype-Personalisation for AI-chatbot Reply Enhancement (Destiny-Gram, 2023) - to Enterprise Level Data Security and the Creation of AI-Governance Infrastructure on a European Scale (Constitutional-Memory, 2026)



Spain's [Constitutional Valley\(Málaga\)](#) will offer Europe its own model: "*Personalisation with Data Sovereignty*" - the ethical, EU-native alternative to Silicon Valley's Surveillance Capitalism infrastructure offered in the USA.



The [European AI-Governance Alliance](#) will own and govern the infrastructure its own employees depend upon - the way SWIFT gave European finance its own payments backbone, and Airbus gave Europe its own aerospace capability.

The Alliance will be led by a [European Sovereign AI-Partner](#) with both technical and strategic authority: a first-mover position that defines the standard before others can replicate it.

5. OFFICIAL DISCLAIMER — AS PUBLISHED

The following disclaimer is published on the Constitutional Memory website and attached to all public disclosure materials. It applies in full to all references to Málaga TechPark, Universidad de Málaga, and all other named entities.

The Constitutional Memory | European AI-Governance Alliance | Constitutional Valley (Málaga) initiative is an independent research and innovation effort aimed at exploring the creation of trusted digital infrastructure for data sovereignty and AI governance.

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Constitutional Valley, Málaga, Spain · March 2026

APPENDIX A · RECORD OF ENGAGEMENT WITH MÁLAGA ECOSYSTEM — NOV 2024 TO MAR 2026

The following is a factual record of correspondence initiated by Constitutional Memory S.A. with Málaga TechPark (PTA) and the Universidad de Málaga (UMA) between November 2024 and March 2026.

#	Date	To / From	Subject	Attachment	Reply
1	25/11/24	TeoDomiro (UMA) cc. E Pimentel; R Maria Bermudez Ruiz; A Vallecillo (UMA)	Request for reply to registered letter sent to Dean, UMA, dated 15/11/24	Copy of letter sent to Dean UMA requesting meeting to discuss potential partnership	—
2	12/12/24	TeoDomiro (UMA) cc. Susan Cabrera Yeo (UMA)	Further reference to letter 15/11 and email follow up on 25/11 and request for response	Copy of letter and Introductory Paper on Destiny-Gram for UMA	—
3	21/12/24	TeoDomiro (UMA) cc. Susan Cabrera Yeo (UMA)	Further reference to letter 15/11 and email follow up on 25/11 and 12/12 and request for response	—	—
4	24/01/25	TeoDomiro (UMA)	Further reference to all prior emails. Request for meeting to give 15-minute presentation on proposal for AI research centre and co-development of commercialisation methodologies	Destiny-Gram UMA proposal; Copy formal letter 23/01/25 Proposal of Strategic Partnership	—
5	24/01/25	F. Romera (PTA) cc. TeoDomiro (UMA)	Formal request for meeting to discuss project and role of Malaga Tech ecosystem	Destiny-Gram Overview document	—
6	01/02/25	TeoDomiro (UMA) cc. F. Romera (PTA)	Formal presentation of strategic opportunity for Malaga. Request for meeting / offer to present	Project Resumen; Approach document to UMA/PTA	—
7	11/02/25	TeoDomiro (UMA); F. Romera (PTA)	Further follow-up and update to all previous correspondence (15/11, 12/12, 21/12, 24/1, 1/2) and expression of preference to collaborate with Malaga ecosystem. Request for 15-minute meeting	One page personal note and copy of previous correspondence	✓ PTA
7+	12/02/25	FROM: C. Gálvez (PTA)	Stated that had been designated by F. Romera to make contact, and offered meeting 14/02	Ref: Confidential joint proposal to TeoDomiro (UMA) & F. Romera (PTA)	✓
7++	13/02/25	C. Gálvez (PTA)	Acceptance of meeting offer	Agenda: Project description; Opportunity for collaboration; Request for PTA help; Mutual benefits	✓
7+++	20/02/25	FROM: C. Gálvez (PTA)	Confirmation of intent to contact relevant contacts in UMA	—	✓
8	13/03/25	TeoDomiro (UMA) cc. C. Gálvez (PTA); S. Trapero; R. Maria Bermudez Ruiz; E. Pimentel; A. Vallecillo; P. Merino; J F Aldan (UMA); M. Huidobro (AEBAN)	Confirmation of business card exchange at Transfiere Exhibition, Málaga. Formal proposal for strategic partnership, MVP/pilot cooperation. Request for response.	—	—
9	18/03/25	TeoDomiro (UMA)	Follow-up to previous emails which had no response, providing a URL link to MVP proposal, with request for a response	Link to proposal in email	—
10	18/03/25	S. Trapero (OTRI/UMA) cc. C. Gálvez (PTA)	Request for meeting with S. Trapero to discuss proposal, following referral by C Gálvez	Ref: Website documents	✓
11	24/03/25	TO: Destiny-Gram FROM: S. Trapero cc. C. Gálvez (PTA)	Referral to UMA Employability Services Department	Referral to A. Penafiel (UMA)	✓

#	Date	To / From	Subject	Attachment	Reply
12	31/03/25	A. Penafiel (UMA) cc. S. Trapero (OTRI/UMA); TeoDomiro (UMA)	Request to A. Penafiel for meeting to discuss partnership opportunity, following referral by S. Trapero	—	—
13	09/04/25	C. Gálvez (PTA)	Email of thanks but expression of frustration at lack of any response from UMA (A. Penafiel / TeoDomiro)	—	—
14	28/05/25	C. Gálvez (PTA)	Project development update and advice of contact with UPC and Universities in UK/USA and follow-ups with F. Romera (PTA)	University Partnership proposals — PhD / Entrepreneur in Residence	—
15	03/12/25	C. Gálvez (PTA)	Explanation of development of new Enterprise Data Sovereignty model — Constitutional Memory, and BytePeaks role as fractional CTO. Request for new meeting.	One-page presentation — Constitutional Valley Opportunity sheet/pitch	—
16	06/12/25	C. Gálvez (PTA)	Follow-up request for presentation of new AI-Governance model for Enterprise to R. Ventura (UMA) and F. Romera (PTA). Request for January meeting to discuss role for PTA before pursuing university partnerships in UK/USA.	Joint UMA/UPC/PTA collaboration proposal	—
17	06/12/25	R. Ventura (UMA); C. Angulo (UPC) cc. C. Gálvez (PTA)	Request for joint review of new proposal	Outreach partnership proposal UMA/UPC/PTA	—
18	09/03/26	C. Gálvez (PTA)	Request for meeting based on developing Constitutional Memory model. Advice of developing contacts in Barcelona ecosystem, Telefónica, Indra, etc.	—	—
19	12/03/26	C. Gálvez (PTA)	Follow-up to 9/03 email asking for meeting to discuss developments	—	—
20	13/03/26	C. Gálvez (PTA)	Follow-up to emails (9/03, 12/03) requesting meeting, or offering more information on request. Advisement of developing contacts with ADA / ANIA / UGR.	—	—
21	16/03/26	TeoDomiro (UMA); F. Romera (PTA) cc. C. Gálvez (PTA)	Scheduled references to previous correspondence about strategic opportunity for Málaga Institutions. Update of development of Research & Innovation initiative — Constitutional Memory / European AI-Governance Alliance / Constitutional Valley (Málaga). Open offer to PTA/UMA to request further information and engage as potential partners.	<u>Formal Notification</u> E Mail – to UMA/PTA Ref: Constitutional Valley Public Disclosure and Institutional References <u>Formal Disclosure</u> – Constitutional Valley: Status, Role of institutions, Engagement to-date, and Official Disclaimer	?
22	16/03/26	TeoDomiro (UMA); F. Romera (PTA) C. Gálvez (PTA)		<u>Hard Copies</u> of above documents sent to recipients by Recorded Mail	

Key: ✓ = Reply received — = No reply received ? = Awaiting response Pink rows = no institutional response to date



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APPENDIX B · CURRENT ECOSYSTEM ENGAGEMENT — SELECTED CONTACTS AS OF MAR 2026

The following lists reflect outreach and contact and/or dialogue initiated by Constitutional Memory S.A. as of March 10TH, 2026. Discussions are at an early stage and in progress. Inclusion denotes contact initiated — not confirmation of partnership, endorsement, or commitment by any named individual or organisation.

TIER 1 — AI GOVERNANCE LEADERS / POTENTIAL EUROPEAN AI-GOVERNANCE ALLIANCE HONORARY PRESIDENTS (Top 10 as of March 16th, 2026)

#	Name	Role / Affiliation	#	Name	Role / Affiliation
1	Stuart Russell	Professor Computer Science, UC Berkeley	6	Herman Van Rompuy	President Emeritus, European Council
2	Sir Nigel Shadbolt	Chair AI@Oxford; Principal, Jesus College Oxford	7	Dame Julie Maxton DBE	Chair, Ada Lovelace Institute
3	Margrethe Vestager	Chair, DTU Board	8	Sir Rob Wainwright KCMG	Senior Cyber Partner, Deloitte
4	Thierry Breton	Architect, EU AI Act	9	Claudia Nemat	Chair of Board of Management, Deutsche Telekom AG
5	Marc Murtra Milla	Chairman, Telefónica S.A.	10	Patrice Caine	Chairman & CEO, Thales Group

TIER 2 — MÁLAGA & ANDALUCÍA ECOSYSTEM (Top 20 as of March 16th, 2026)

#	Name	Role / Affiliation	#	Name	Role / Affiliation
1	Francisco de la Torre	Mayor, Málaga	12	Teodomiro Lopez Navarette	Dean / Rector, UMA
2	Bernardo Quintero	Cybersecurity Cultural Ambassador, Google	13	Elias Bendodo	Political Network, General Coordinator Partido Popular
3	Juan Manuel Moreno Bonilla	President Junta Andalusia / Regional Government	14	David de Francisco Marcos	National Political Authority, Sub-Director Ministry of AI Regulation, (Madrid)
4	Raul Jimenez	Director General, ADA	15	Jose Maria Lopez	Director Cybersecurity Cluster, Ayuntamiento
5	Manuel Perera Dominguez	Director General Strategy, ADA	16	Enrique Rando	CTO, ADA and CIAN
6	Manuel Escobar	Sub-Director Digital, ADA	17	Nadia Calviño	President EIB; ex-Minister Economy Spain
7	Francisco Herrera	Professor AI, UGR	18	Rafael Ventura /	Professors of Entrepreneurship. UMA
8	Natalia Diaz Rodriguez	Professor UGR / DaSCI,	19	Ernesto Pimentel	Professor of Computer Science, UMA
9	Jorge Paradela	Regional Minister, President ADA	20	Jose Cerdan Ibanez	Ex-CEO Telefónica Tech
10	Felipe Romera	CEO, Málaga Tech Park	21	Chema Alonso	Ex-CTO Telefónica Digital; Cloudflare
11	María González Veracruz	Ex-Secretary of State, Digitalisation/AI	22	Victor Munoz	Head Engineering/ Automation, UMA

TIER 3 — POTENTIAL SOVEREIGN AI INFRASTRUCTURE PARTNERS
(Top 40 as of March 16th, 2026)



#	Name	Role / Affiliation	#	Name	Role / Affiliation
1	Marc Murtra Milla	Chairman — Telefónica	22	Horacio Morell Galvez	GM — IBM Spain
2	Maria Jesus Almazor	CRO — Telefónica	23	Claudia Nemat	Chair — T-Systems
3	Sebas Muriel Herrero	CEO — Telefónica Tech	24	Dr Ferri Abolhassan	CEO — T-Systems
4	Irene Gomez	CEO — Wayra	25	Osmar Polo	Chairman & CEO — T-Systems Spain
5	Raquel Ruiz Lozano	Head Strategy — Wayra	26	Angel Escribano Ruiz	President — Indra Group
6	Pablo Garcia Perez	CFO — Wayra	27	Jose Vicente de los Mozos	CEO — Indra Group
7	Christel Heydemann	CEO — Orange (Group)	28	Domingo Miron	Patrono — Accenture Spain
8	Jerome Henique	CEO — Orange (France)	29	Maria González	SVP — Accenture
9	Paul Hermelin	Chairman — Capgemini	30	Fernando Ruiz Fernandez	CTO — Repsol
10	Aiman Ezzat	CEO — Capgemini	31	Fernando Abos	CEO — Prosegur
11	Laurent Perea	CEO — Capgemini Spain	32	Norbert Rotter	CEO — NTT Data
12	Octava Klaba	CEO — OVHcloud	33	Antonio Penalver	CEO — Sopra Steria
13	John Gazal	CEO — OVHcloud Spain	34	Michel Poujol	CTO — Sopra Steria
14	Patrice Caine	Chairman — Thales	35	Dr Philipp Herzig	CEO — SAP SE
15	Guillermo Rosello	CEO — Thales Spain	36	Augusta Spinelli	SVP — SAP EMEA
16	Jim Hagemann Snabe	Chairman — Siemens	37	Anton Gostev	CEO — Veeam
17	Roland Busch	CEO — Siemens	38	Dr Stefan Hartung	Chairman — Bosch
18	Fernando Silva	CEO — Siemens Spain	39	Dr Tanja Ruckert	Member Management Board — Head of Bosch Innovation
19	Philippe Salle	CEO — Atos	40	Axel Deniz	CEO — Bosch Innovation
20	Arvind Krishna	CEO — IBM	41	Florian Marcard	Head — Bosch R&D
21	Ana Paula Assis	SVP — IBM EMEA	42	Alberto Anaya	CEO — CGI Spain

Inclusion denotes outreach/invitations to connect initiated by Constitutional Memory S.A. (as of 16.03.26)
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Constitutional Valley, Málaga, Spain · March 2026



Iniciativa Valle Constitucional de Málaga – Ecosistema de Innovación



"La Iniciativa Valle Constitucional de Málaga impulsa un ecosistema andaluz de gobernanza y memoria constitucional para una infraestructura europea de inteligencia artificial"





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Constitutional Valley, Málaga, Spain · March 2026