JACOB REBO

JD / MBA | AIGP | LSSMBB | Former Captain, U.S. Army

CULLIS AI
DEFENSIBLE | COMPETENT | PROFITABLE

Founder and Chief Executive Officer | Cullis AI, LLC

AI Governance Consulting | Expert Witness Services | Accredited Continuing Legal Education

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Location: Billings, Montana (Travels Nationally)
Bar: State Bar of Montana

PROFESSIONAL PROFILE

Jacob Rebo is an attorney and AI governance professional. His work centers on the defensible, competent, and profitable development and deployment of artificial intelligence in business organizations, with particular depth in regulated organizations such as law firms. He works on both sides of the AI lifecycle: the steps engineers, developers, and manufacturers must take so that an AI product reaches the market with defensible and reasonable protections built in, and the steps organizations must take when they procure and deploy AI inside their own operations.

Mr. Rebo is the Founder and Chief Executive Officer of Cullis AI, LLC, a Montana-based professional services firm providing AI governance consulting, expert witness services on AI development and deployment, and accredited continuing legal education on AI deployment to law firms, corporations, courts, and other organizations, including mediators.

Mr. Rebo brings decades of proven operational leadership, including four years leading legal operations for two large technology companies, and he has been a licensed attorney since 2020. Beginning in 2023, as generative AI entered the enterprise, he spearheaded the initial development of Infinera Corporation's AI governance program. The program was agile and forward-leaning but also safe and defensible, and it allowed rapid early adoption of AI in Infinera's workflows. After Nokia acquired Infinera in February 2025, Mr. Rebo led the update of the Network Infrastructure Business Group's AI governance program, centralizing it with Nokia's enterprise program while keeping it lean and safe.

In both roles, Mr. Rebo worked directly with engineers and product developers who were building new AI products or adding AI functions to existing products, guiding them through the compliance steps required during development, and he drafted the licensing terms that gave those products their contractual protections. He also built and applied an itemized evaluation protocol for large language models submitted for deployment on an on-premises enterprise AI platform, assessing each model's documentation, including its model card, for safety and effectiveness against industry criteria. More than 20 models went through that evaluation, so he knows AI from the buyer's side as well as the builder's. He holds the IAPP Artificial Intelligence Governance Professional (AIGP) certification. He is also a Lean Six Sigma Master Black Belt (Villanova University, 2014) and applies that quality systems discipline, including process control, defect classification, and measurement system analysis, to how AI systems are tested, evaluated, and approved.

Mr. Rebo is a decorated United States Army veteran. He served fourteen years on active duty, including two combat tours in Iraq (participating in over 500 combat missions and earning the Combat Action Badge) and one combat tour in Afghanistan in 2012 (earning the Bronze Star Medal and induction into the Honorable Order of Saint Christopher). He separated honorably at the rank of Captain. He brings the analytical discipline, ethical grounding, and standards-based rigor of military service to every engagement.

AREAS OF EXPERTISE

AI Development and Product Governance

- AI Product Governance in Design and Development
- Compliance by Design for AI-Enabled Products (EU AI Act, ISO/IEC 42001, NIST AI RMF)
- AI Product Licensing, Terms of Use, and Contractual Protections
- Reasonable Safeguards for AI Developers, Manufacturers, and Providers
- AI Risk Assessment, Tiering, and Management
- AI Ethics, Bias Evaluation, and Fairness Standards
- AI Regulatory Compliance (EU AI Act, U.S. State Frameworks)
- AI Standard Operating Procedures and Documentation

AI Deployment and Enterprise Governance

- Enterprise AI Governance Frameworks and Programs
- Standards of Care for AI Adoption in Legal Practice
- Large Language Model Evaluation and Validation
- Quality Systems, Defect Classification, and Measurement System Analysis
- AI Procurement, Vendor Governance, and Contracting
- Generative AI in eDiscovery and Document Review
- Legal Technology Implementation and Standards
- Contract Lifecycle Management Systems (Ironclad and Peers)
- Legal Operations and Process Engineering

CURRENT PROFESSIONAL ENGAGEMENT

Founder and Chief Executive Officer — 2026 to Present

Cullis AI, LLC | Billings, Montana

- Founded Cullis AI, LLC, a Montana-registered professional services firm delivering AI governance consulting, expert witness services on AI development and deployment, and accredited continuing legal education to law firms, in-house legal departments, courts, and other organizations.
- Provides AI governance consulting across three engagement tiers: remote shadow and hidden AI audit with a malpractice-defensible policy; the same plus on-site policy and compliance training; and a vendor selection process run on a disclosed-preference model together with an economic model reassessment, supporting client legal operations from small firms through enterprise legal departments.
- Serves as expert witness on AI governance across the AI lifecycle: the safeguards AI developers, manufacturers, and providers build into their products, and the standards of care organizations meet when they procure and deploy AI, including AI risk management, legal technology deployment, and enterprise AI program design.
- Designs and delivers accredited continuing legal education (Montana CLE Provider ID 5588) on generative AI for law firms and legal organizations, and continuing education programming on AI for mediators.

PRIOR PROFESSIONAL EXPERIENCE

Director of Legal Operations — 2025 to 2026

Nokia Corporation, Network Infrastructure Business Group | Billings, Montana (Remote)

- Served as lead AI legal representative for Nokia's Network Infrastructure Business Group and senior contributor to Nokia's broader AI legal program.
- Following Nokia's February 2025 acquisition of Infinera, led the update of the business group's AI governance program and its centralization with Nokia's enterprise program, keeping it lean and safe

while ensuring AI-enabled products and deployments were defensible, competent, and profitable: compliant, protected by proper contract and license terms, and delivered on schedule without getting bogged down in process.

- Supported Nokia's enterprise-wide AI governance and deployment initiative, and helped design and implement Nokia's proprietary automated tool for managing the lifecycle of AI use cases, contributing to the screening, evaluation, and approval of more than 85 enterprise AI use cases across generative AI, classification, retrieval, and agent systems spanning multiple business groups globally.
- Co-authored core enterprise AI governance instruments, including the AI Procurement Guidance, the AI Addendum for Supplier Contracts, and the AI Coding Rules of Engagement.
- Built and applied an itemized evaluation protocol for large language models submitted for deployment on Nokia's on-premises AI solution center, reviewing each model's card and documentation for safety and effectiveness against industry criteria, including security, data handling, license terms, and operational risk. Evaluated more than 20 models and more than doubled the solution center's large language model capacity.
- Worked directly with engineers and product developers building new AI products or adding AI functions to existing products, guiding them through the compliance safeguards required during design and development under the EU AI Act, ISO/IEC 42001, and the NIST AI Risk Management Framework, and translating emerging AI regulations and ethical principles into practical guidance for engineers, product teams, and in-house counsel.
- Drafted the AI provisions in the license terms for AI-enabled products, giving each product the contractual protections and wording required for commercial deployment.
- Built cross-functional AI governance partnerships with Nokia's Chief Technology and AI Officer organization, Compliance, Trade Management, and Procurement.

Director of Legal Operations — 2024 to 2025

Infinera Corporation | San Jose, California (Remote)

- Designed, planned, and implemented Ironclad, an AI-enabled contract lifecycle management (CLM) solution, across Infinera's global operations, consolidating enterprise contract operations and establishing standardized contract workflow governance.
- Led automation initiatives that reduced contract turnaround times and improved accuracy across legal operations.
- Continued to lead Infinera's AI governance program, guiding product engineers through the compliance steps required when building AI functions into products and drafting the AI provisions in the corresponding product license terms.

Corporate Counsel, Global Operations and Regulatory Compliance — 2022 to 2024

Infinera Corporation | San Jose, California (Remote)

- Served on a three-attorney team supporting global trade compliance, operations (including procurement, logistics, and R&D), open source software use, and artificial intelligence use.
- Beginning in 2023, spearheaded the initial development of Infinera's AI governance program, an agile and forward-leaning program that remained safe and defensible and enabled rapid early adoption of AI in Infinera's workflows.
- Co-authored the Infinera AI Use Policy governing enterprise AI adoption, and developed the Free and Open Source Software (FOSS) policy governing Infinera's use, distribution, and contribution practices for open-source code.
- Led CHIPS Act funding compliance workstream, coordinating cross-functional documentation and regulatory positioning for U.S. semiconductor incentive eligibility.

- Managed TradeFirst certification for Infinera's Singapore Global Distribution Center, ensuring compliance with Singapore Customs requirements.

Litigation Associate
2020 to 2022

Crowley Fleck PLLP | Billings, Montana

- Litigated complex civil matters in Montana state and federal courts, including discovery practice, depositions, motions practice, and trial preparation.
- Developed working understanding of discovery obligations, evidence authentication, expert witness practice, and legal technology tools applicable to document review and case management.

Cardiac Rhythm Management Sales Representative
2014 to 2017

Boston Scientific Corporation | Billings, Montana

- Sold and supported Class III implantable cardiac devices in a highly-regulated FDA compliance environment, including pacemakers, implantable cardioverter-defibrillators, and related accessories.
- Provided in-procedure technical support to cardiologists and electrophysiologists during device implantation and follow-up.

SELECTED ENGAGEMENTS

Consultant | AI and Machine Collection of Public Agency Data
2026

Montana State Library and Montana Natural Heritage Program | Montana Field Guide

Advised the Montana State Library and the Montana Natural Heritage Program on automated and AI collection of the Montana Field Guide's public content. Delivered an Authorized Machine Use and Attribution Playbook and a Technical Annex covering machine-readable use signals, attribution carried with the content, monitoring for abusive bulk collection, and a decision record for agency leadership (October 2026).

Independent Expert Opinion Letter | EB-2 National Interest Waiver Petition
2026

Retained by an individual petitioner | Non-litigation engagement

Provided an independent expert opinion letter supporting a Form I-140 petition (EB-2, national interest waiver) in an AI-related field, after review of the documentary record and working sessions with the petitioner. The client's identity and the details of the engagement are confidential under the engagement agreement.

EDUCATION

Juris Doctor / Master of Business Administration (JD / MBA)
2020

Alexander Blewett III School of Law and College of Business, University of Montana

Missoula, Montana

Advanced Master's Certificate in Lean Six Sigma
2014

Villanova University

Villanova, Pennsylvania

PROFESSIONAL CERTIFICATIONS

Artificial Intelligence Governance Professional (AIGP) **Cert. No. 000910401I**
International Association of Privacy Professionals (IAPP) | Effective May 28, 2026; valid through May 31, 2028

Lean Six Sigma Master Black Belt (LSSMBB) **Cert. No. VIL012091**
Villanova University | July 2014

PUBLICATIONS (PREVIOUS 10 YEARS)

"Buy AI is a lot like buying a used truck" **October 2026**
Daily Montanan (commentary) | dailymontanan.com

"AI Governance Is Not the Brake. It's the Gate." **October 2026**
Cullis AI Insights | cullis.ai/insights

"Hidden AI: The Risk Already Inside Your Firm, and the Rules That Make It Yours" **2026**
Cullis AI Insights | cullis.ai/insights

SPEAKING ENGAGEMENTS AND PRESENTATIONS

Presenter | The Billable Hour in the Age of AI **October 2026**
Ninth Judicial District Bar Association | Annual CLE program (remote)
One-hour ethics CLE on Rule 1.5, ABA Formal Opinion 512, and the small firm fee agreement when work is AI-assisted.

Co-presenter | AI at City Hall **October 2026**
Montana League of Cities and Towns Annual Conference | Helena, MT
Co-presented with Cody Rose of AI Fluency on AI adoption and governance in municipal government.

Panelist | AI Fluency for Montana Business **September 2026**
Montana AI Summit 2026, Montana High Tech Business Alliance | University of Montana, Missoula, MT
Panelist on organizational AI fluency, addressing where organizations stand with AI adoption and where they should be, the most common adoption mistakes, what matters in AI governance, privacy, and compliance and what is noise, how to bring skeptical teams along, how to measure whether AI use is working, and what AI means for jobs, hiring, and durable skills.

Panelist | AI Fluency for Local Business **June 2026**
Montana High Tech Business Alliance | The Red Door Lounge, Billings, MT
Panelist in an open-floor discussion taking questions from local business leaders on AI usage, development, and governance.

Panelist | Ethical AI Use in Legal Education **March 2026**
University of Montana IP Day 2026 | Alexander Blewett III School of Law, Missoula, MT
Panelist on the ethical use of artificial intelligence in legal education, addressing the issues law faculty and law students need to confront in using AI.

Panelist | AI in Legal Operations **October 2025**
Consero Corporate Legal Operations Forum | The Ritz-Carlton Dallas, Las Colinas, Irving, TX
Served as panelist at Consero's invitation-only national legal operations forum, presenting to senior in-house legal operations leaders, general counsel, and chief legal officers on artificial intelligence adoption, AI governance, and enterprise AI deployment in corporate legal functions.

Panelist | Artificial Intelligence and Legal Practice **March 2025**

University of Montana IP Day 2025 | Alexander Blewett III School of Law, Missoula, MT

Presented and participated as panelist on artificial intelligence ethics, legal competence obligations under the Model Rules of Professional Conduct, and practical AI governance for legal practice. Audience included law faculty, practicing attorneys, judges, and law students.

Panelist | AI Ethics and Legal Competence **March 2024**

University of Montana IP Day 2024 | Alexander Blewett III School of Law, Missoula, MT

Panelist presentation on artificial intelligence ethics for legal practitioners, addressing the duty of competence regarding AI tools, confidentiality risks in generative AI use, and emerging professional responsibility standards.

PRIOR TESTIMONY (PREVIOUS 4 YEARS)

None. Mr. Rebo has not testified as an expert at trial or by deposition. This section will be updated as engagements proceed.

MILITARY SERVICE AND HONORS

Captain, United States Army — Fourteen Years Active Duty Service

- Three combat deployments: two combat tours in Iraq and one combat tour in Afghanistan (2012).
- Iraq: Participated in over 500 combat missions across two deployments.
- Separated honorably at the rank of Captain following fourteen years of active duty service.

Decorations and Honors

- Bronze Star Medal, awarded for meritorious service in connection with combat operations in Afghanistan (2012).
- Combat Action Badge, awarded for active engagement with or being engaged by the enemy during combat operations in Iraq.
- Honorable Order of Saint Christopher, U.S. Army Transportation Corps. A professional recognition presented by the Transportation Corps for significant contributions to Army transportation, received during his Afghanistan deployment.

PROFESSIONAL AFFILIATIONS

- State Bar of Montana
- International Association of Privacy Professionals (IAPP)
- American Bar Association
- Billings Chamber of Commerce