UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

RUGGERO SANTILLI and CARLA SANTILLI,

Plaintiffs,

CASE NO. 8:17-cv-1797-T-33MAP

V.

PEPIJN VAN ERP, FRANK ISRAEL AND HOSTING2GO,

Defendants,			

AFFIDAVIT OF SCOTT TADSEN

- I, Scott Tadsen, the undersigned affiant, being first duly sworn, hereby deposes and says:
- 1. I am over the age of eighteen, have personal knowledge of the facts set forth below and am competent to testify.
- On February 2, 2018, I visited the laboratory of Plaintiff, Ruggero Santilli, to view and examine the equipment that Plaintiff completed, called the Directional Neutron Source (DNS).
- 3. In my role of investment and security specialist, I seek funding to market this preproduction equipment which is technology intended for scanning of nuclear materials that could be smuggled into suitcase and other containers.
- 4. When I approached potential investors for Plaintiff, they google Plaintiff as part of their due diligence and the title of the blog "The Continuing Stupidity of Ruggero Santilli" is the first to appear and always prominently under the Wikipedia page and the Curriculum of Plaintiff.

- 5. This search raises immediate questions and negativity towards Plaintiff's professional reputation and skills.
- 6. This search stops and hinders many people in their tracks as they will not even take the time to go further in their due diligence and instantly reject Plaintiff.
- 7. It is impossible to evaluate how many funding sources (individuals and companies) are lost because of the defaming articles and will impede or delay this technology that is proposed for national security

FURTHER AFFIANT SAYETH NAUGHT.
Scott Tadsen
STATE OF <u>FLORIDA</u>)
COUNTY OF PINEUAS)
Sworn to and subscribed before me this 17th day of February, 2018, after production of Identification FLOMENT DLWER'S LICENSE or was personally known by me

Notary Public

My Commission expires: 10/13/2019