

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.

TIMOTHY 
AFFIDAVIT OF SCOTT WAINWRIGHT

TIMOTHY
I, Scott Wainwright, 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.
2. For the past three (3) months, as a professional management consultant for public companies, I have visited the office and laboratory of Plaintiff, Ruggero Santilli, to view and examine the equipment that Plaintiff completed, called the Directional Neutron Source (DNS).
3. In my role as a professional consultant , I seek investor introductions to the company to market this pre-production equipment which is technology intended for scanning of nuclear materials that could be smuggled into suitcase and other containers.
4. In my role, I also receive marketing materials, including a brochure, to assist Plaintiff with commercializing the equipment which could have applications for civil and military use.

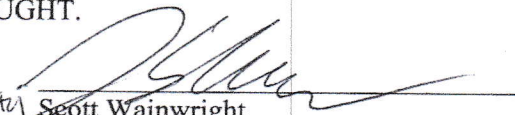
5. I have worked in the past with Plaintiff, in particular MagneGas and have found that the defamation by Defendants are a great obstacle to overcome with investors as they will search and look at the internet for due diligence.

6. When approaching potential investors for Plaintiff, they will 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.

7. I know from experience that the negative articles/blogs published by Defendants will turn away investors from continuing their due diligence and when this new technology is submitted the negative articles/blogs published by the Defendants will have a negative impact on the pre-screening of this project and its overall success through investors.

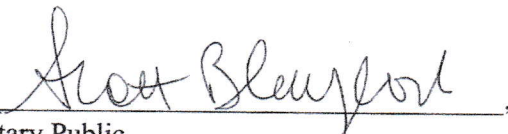
8. It is impossible to evaluate how many funding sources (individuals and companies) are and/or will be lost because of the negative articles/blogs and they will impede or delay this technology that is proposed for national security.

FURTHER AFFIANT SAYETH NAUGHT.


TIMOTHY Scott Wainwright

STATE OF FLORIDA)
COUNTY OF PINGUAS)

Sworn to and subscribed before me this 5 day of ^{MARCH}~~February~~, 2018, after production of Identification FLD or was personally known by me _____.


Notary Public

My Commission expires: 09/13/2021



Scott Blaylock
Notary Public
State of Florida
My Commission Expires 09/13/2021
Commission No. GG 142688