

AFFIDAVIT OF [REDACTED]

I, [REDACTED], being first duly sworn on oath, state that if called upon as a witness, I would be competent to testify as to the following:

1. I am a [REDACTED] student in the Nuclear Engineering Department at Purdue University. As a freshman at Purdue University, I took the Nuclear 200 class in the [REDACTED]. That is how I met Dr. Taleyarkhan. I am scheduled to graduate in [REDACTED]

2. During the time I was in Dr. Taleyarkhan's class, I often attended office hours to get homework help. This is where I developed a working relationship with Adam Butt, who was the teaching assistant of the course, and where I first got to know Dr. Taleyarkhan. Dr. Taleyarkhan and Adam Butt were very helpful to me and were always willing to give their time for the benefit of students.

3. Because I was fascinated by his research and took such an interest in his class, I was asked to join Dr. Taleyarkhan's research group in the summer of 2005.

4. I thoroughly enjoyed his class and found Dr. Taleyarkhan to be very encouraging as a professor and as a motivator for students. With regard to his research, I am continuously impressed by his insight and knowledge into the subject matter of what he does. He always seems to go out of his way to help students.

5. [REDACTED]

[REDACTED] We invited Dr. Taleyarkhan to speak about safety in the nuclear power industry. I remember he gave a fantastic presentation, which he spent a great deal of time preparing, and even went out with the officers to dinner. We all felt respected by him and we, in turn, respected

him. He genuinely cares about educating students whether it is in the classroom, in the lab, or in the evening.

6. [REDACTED], I believe that Dr. Taleyarkhan is a model researcher. He takes his work seriously and takes research ethics seriously.

7. I personally have never known Dr. Taleyarkhan to manipulate students and I have not heard other students say that they have been manipulated by him. I find him to be a very trustworthy individual based upon my experience with him and his dedication and devotion to teaching. I feel that he respects me and values the work that I have done for him.

8. I cannot say the same about Dr. Lefteri Tsoukalas ("Tsoukalas"). I have had limited interactions with Dr. Tsoukalas, but I've certainly heard the rumors about him and his antics as a former head of the School of Nuclear Engineering. It is an unfortunate situation.

9. For me personally, I have established a negative opinion of Dr. Tsoukalas based upon those rumors, but for me this was confirmed when I took a course taught by him. As a professor and instructor, I did not like Dr. Tsoukalas. He did not put an emphasis on his teaching and he only showed up half the time for class. I found his class to be an unpleasant experience. Lessons were planned badly, homework was unrelated to the lectures, and we never received feedback on the assignments. The class was a technical writing course designed to develop our ability to communicate technical information effectively. Having never received comments or even a grade for a single assignment, I had no way of tracking my progress in this area. A letter grade at the end of the course was the only indicator of performance. He is also in charge of my senior design course which is a three hour, once a week course. He shows up for ~30 minutes and lets us loose for the rest of the time. I find it unfair that he teaches the course in this manner.

In the previous semester of senior design, Dr. Choi, our instructor, would not leave the room until the last student had gone, and was adamant about helping students. It seems that Dr. Tsoukalas does not respect teaching, his students, and does not place an emphasis on students learning the material. I will mention that Dr. Tsoukalas did participate in a panel discussion for [REDACTED] two years ago. This invitation was extended by me; however this occurred before the research ethics scandal. I was so shaken by the events that occurred; that I would not have wished him to [REDACTED] had the scandal happened earlier.

10. During the summer of 2005 when I worked in Dr. Taleyarkhan's lab, I witnessed Adam Butt ("Butt") work with Dr. Yiban Xu ("Dr. Xu") in the lab. Butt was my graduate student advisor at the time until he left shortly after his thesis was completed in December 2005. During the summer of 2005, I was working on automation software for sonofusion. His work consisted of intense knowledge of the sonofusion experiments and he was working on an advanced computer model of the acoustic chamber. He obviously understood his work quite well. I assisted him by conducting some experiments to validate his computer models.

11. Regarding the Nuclear Engineering and Design ("NED") paper and the NURETH-11 paper for which Dr. Xu and Butt were co-authors, I was not involved in the research for those papers that I know of. My work made a contribution to his thesis, but not the papers in question. I remember in our regular research meetings in 2005 that Dr. Xu and Butt were present and discussed the papers as co-authors. I do not remember Dr. Xu or Butt ever standing up and claiming otherwise. Rather, they discussed the papers during our research meetings and there was nothing unusual about Butt being a co-author on those papers that I ever heard of.

12. I remember when the Purdue press came in to the laboratory to take pictures in the summer of 2005 because I had set up an experiment that got canceled that day due to the press. At that time, Dr. Xu and Butt posed for pictures in front of the apparatus that I had set up for my experiment. As best as I could tell, Butt was excited to be a co-author and never expressed any concern about being a co-author to anyone. His response to the press was positive.

13. Butt was also excited to go to France to present the NURETH-11 paper but he could not get his passport in time. The passport paperwork got delayed due to Hurricane Katrina, which hit the passport office located in New Orleans. I remember he was upset that he could not go to France to present his paper. Butt never told me anything that would lead me to question his co-authorship of the NED and NURETH-11 papers.

14. Furthermore, I never suspected that Butt was not a co-author, either. I believe that Butt had the knowledge and expertise to be a co-author for the NED and NURETH-11 papers based upon my interactions with Butt and Dr. Xu. Butt had become quite an expert in Finite Element Modeling which he used to simulate the acoustic chamber used in Sonofusion experiments. I know that he became so advanced in the software surrounding the acoustic chamber used in the Dr. Xu experiments because his frequent calls to the software support engineers eventually resulted in questions that they could not answer. His models had become advanced enough that the software developers could not assist him when he had problems.

15. When I came to the lab in the [REDACTED], it was my impression and Xu and Butt were heavily involved in the NED and NURETH-11 papers and the research regarding those papers. In my experience, Xu and Butt worked together in the lab and worked well together from what I could see. I remember Xu and Butt spent a lot of time talking about

sonofusion in Xu's office. I remember doing a lot of experiments benchmarking Butt's computer modeling and I can also remember Xu doing tests on sonofusion with Butt's assistance.

16. I remember that Dr. Tsoukalas in the fall of 2006 performed a State of the School Address before the entire student, graduate student, and faculty population of the School of Nuclear Engineering. Usually a State of the School Address, which occurs at the beginning of every semester, focuses on the status of the department. However, I was taken aback when Dr. Tsoukalas started to talk about research ethics and ghost authorship of papers in the department. While he did not mention Dr. Taleyarkhan's name, everyone knew who and what he was talking about. I felt that it was really untactful for him to give this talk openly to the students, especially when people knew there was some kind of an investigation going on, and at that time no information about the investigation had been released to the public.

17. The students that I spoke with after the State of the School Address were surprised and disturbed by the comments by Dr. Tsoukalas. The students I talked to felt that it was unfair, unusual, and untactful for him to do so during the State of the School Address. In my opinion, many students lost respect for Dr. Tsoukalas at that time.

18. Last year, I was asked to write a character testimonial regarding Dr. Taleyarkhan. This request was done through email. I did not even speak with the professor about it and wrote that testimonial voluntarily, speaking of Dr. Taleyarkhan's high standard of research integrity and scholarship. I also wrote of his role as a mentor for me personally and the fact that students generally liked him.

19. If someone said that I or others were influenced by Dr. Taleyarkhan, Dr. Xu or anyone else to write those testimonials which were favorable to Dr. Taleyarkhan, I would strongly disagree. We wrote those testimonials of our own free will and were asked to write on

various issues about Dr. Taleyarkhan's character, whether they were positive or negative. I experienced no undue influence in writing that testimonial or the testimony provided herein from anyone. The facts herein and the testimonial I provided previously were done of my own free will, voluntarily, and without any outside influence.

