

Affidavit of Jere Jenkins

I swear that if called to testify under oath that I can and would attest to the following:

1. I am the Director of Radiation Laboratories at Purdue University and have held that position from August 2004 to the present. I presently serve on the Purdue University Radiation Safety Committee, the College of Engineering Safety Committee, the Dean of Engineering's Staff Advisory Committee, and the Nuclear Engineering Safety Committee where I am a co-chair. I am also on the Executive Committee of the National Organization of Test, Research and Training Reactors, and I am the Chairman-elect of that organization for 2009-10.

2. In my position, I interact with the School of Nuclear Engineering faculty, staff, and students regularly.

3. I believe Lefteri Tsoukalas as former Head of the School of Nuclear Engineering is a very untrustworthy person in my experiences with him. In fact, I would describe him as a "snake oil salesman" given my interactions with him and his "gang of four": Professors Tsoukalas, Mamoru Ishii, Chan Choi, and Tatjana Jevremovic.

4. I find Dr. Rusi Taleyarkhan to be an honest and trustworthy person.

5. One of the reasons I took my job in my current position was because Tsoukalas promised that the NE was going to get a new reactor. I later found out that this was not going to happen despite what Tsoukalas told me. I felt I was misled from the very beginning. I soon learned that these types of false promises were common for Tsoukalas and his gang.

6. I am aware of the first *Nature* article that came out in March of 2006 that was very negative against Dr. Taleyarkhan and which quoted Tsoukalas and Jevremovic. In several discussions with Josh Walter (who worked with Tsoukalas on sonofusion studies) which he initiated, I asked Walter if Dr. Jevremovic really knew anything about what she was saying in that article against Taleyarkhan. Walter told me that she had no idea what she was talking about, given her lack of experience in experimentation and the sonofusion experiments. This confirmed my understanding and I did not believe her statements either because she told me on several occasions that she is not an experimentalist.

7. Based on what I know about Tsoukalas and his gang, I am convinced that the *Nature* article quotes by Tsoukalas and Jevremovic were a set up, part of a concerted effort to ruin Dr. Taleyarkhan's career, and his credibility.

8. Another example of fraud by Dr. Tsoukalas occurred when I went up to Argonne National Laboratory with a junior faculty member in the fall of 2005 when he was in the

middle of his tenure process. He was up for an associate professor with tenure position. This faculty member came from Argonne and had worked at Argonne since 1989 until 2003 at which time he came to Purdue. When we arrived there, his contacts at Argonne who were chosen to write letters of recommendation showed the faculty member letters from Tsoukalas requesting recommendations. This faculty member was upset to learn that the letters stated that he was up for a full professor, not associate professor with tenure. Also, the time deadline for submitting recommendations was dated before the date of the letter itself. I believe this was another concerted effort by Tsoukalas to suppress this faculty member's promotion to increase the chance of promotion of a different junior faculty member, at the expense of the faculty member from Argonne.

9. This behavior of malicious acts of oppression and vindictiveness against faculty was common by Tsoukalas and his gang.

10. Tsoukalas also abused students. If Tsoukalas was against faculty, he would not only try and hurt those faculty members, but also their students. I know that Professor Tom Downar was constantly harassed by Tsoukalas and his cohort, and one particular in on particular event that I know of Professor Choi verbally abused one of Downar's students in the hallway of NUCL, telling her she was going to flunk the Qualifying Exam (which she wasn't even supposed to take) whether or not she took it. Downar subsequently left the University for the University of California at Berkeley. After he left, Tsoukalas was still attacking Downar's credibility.

11. Tsoukalas lied to me and others all the time. In November of 2005, a student of Jevermovic's, Shaun Clarke, had decided to leave her research group and work for Downar. Clarke was supposed to be a Teaching Assistant (TA) for my NUCL 205 class in the Spring of 2006, and I had already discussed that with Tsoukalas. After Clarke had announced his resolution, Tsoukalas then would not let Clarke be the TA for the 205 class. When I asked Tsoukalas for an explanation, he stated that some questionable things had come up in Clarke's academic record, and he would not be allowed to be the TA. Since I was aware of the actual situation (as Clarke had previously told me his side do the story, I knew that Tsoukalas's statements were a lie and this was really Tsoukalas' vindictiveness.

12. Another occasion where I caught Tsoukalas in a lie was after he returned from the American Nuclear Society conference in November of 2005. I was already deeply involved in the conversion of the Purdue University nuclear reactor, PUR-1, from highly enriched uranium to low enriched uranium, an effort which I was leading with assistance from the Department of Energy (DOE), Idaho National Laboratory, and Argonne National Laboratory. Tsoukalas had been passing through the main office, and told me that the conversion project was going to be put on hold (something I knew was not true). He specifically stated that someone at the DOE had told him there was a problem with the fuel. When I pressed him on that issue, and asked if he was confusing our fuel with the fuel type needed for the high-performance reactors, he became very irritated that I would question him, and was yelling at my from inside his office, telling me that he would talk to me about it later. During the subsequent meeting (the first opportunity that

was available to me, Ed Merritt and Ben Revis of the reactor staff were also present) the week before Christmas, I explained that this project was going to happen whether we wanted to or not, and I had verified that up through the chain at INL, and DOE, he became more congenial. He then gave Ben, Ed and myself each a \$100 bill, which he placed into Christmas cards in front of us, stating that he was normally more prepared for these gifts, and asked our forgiveness that he hadn't had time to prepare something better. I asked Ed, who has worked at Nuclear Engineering since the mid-70s if he had ever received a gift from the department head, and he said no.

13. I know of several more instances of student abuse and manipulation at the hands of Tsoukalas and his group. I know in 2007 that Tsoukalas and Jevremovic told Godfree Gert, a graduate student who came to work under Tsoukalas, that if he left Jevremovic's group to work for Downar, that he would lose his Visa and would have to go back to South Africa where he was from. Gert was outright threatened in this fashion by Tsoukalas and Jevremovic.

14. In early fall semester of 2005, graduate student Daniel Mundy had also decided to leave Jevremovic's research group, but was intending to leave the university altogether and attend graduate school at the Mayo Clinic in Rochester, MN. Tsoukalas met with Mundy to try to convince him to stay, and asked if Dan was concerned with taking the Qualifying Exam for his doctoral work. He stated that Dan shouldn't be concerned with that, as his advisor (Jevremovic) was on the graduate committee, and would be able to give him the questions before the exam. Dan told me of this right after his meeting with Tsoukalas, because he thought that was pretty far out of bounds and wanted to ask my opinion.

15. Tsoukalas many times talked of fraud with regard to Taleyarkhan's research. He told me that Taleyarkhan was going to be deported back to India because of his fraudulent research. Others in Tsoukalas' gang told me similar stories about Taleyarkhan and fraudulent research, and Choi even claimed that DARPA would come and attempt to seal up Taleyarkhan's lab because of fraud in Taleyarkhan's research. This statement to me by Choi was in the presence of Robert Bean from Idaho National Laboratory, and Ed Merritt from Nuclear Engineering at Purdue.

16. In January of 2006, I was present at the State of the School of Nuclear Engineering address given by Tsoukalas to about 180 students and graduate students of the School. At that time Tsoukalas said there was a severe problem of "Academic Dishonesty" among members of the department and with members publishing research that is not correct. Everyone knew he was talking about Taleyarkhan. This was a very significant statement to be made to the entire School, especially to the graduate students and students. I remember the slide that had "Academic Dishonesty" in red letters on the Power Point slide of challenges which the school had to overcome, which Tsoukalas had on the screen for that address.

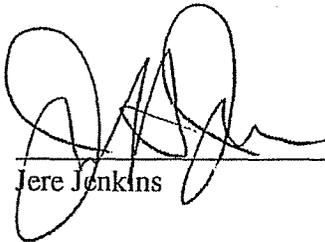
17. I also learned from Josh Walter that Tsoukalas was in direct contact with Seth Putterman and Ken Suslick, two of Taleyarkhan's known competitors. I knew this

because Walter would tell me details about it. For instance, Brian Naranjo worked under Putterman and was also a detractor of sonofusion. Walter would tell me that Naranjo's work criticizing Taleyarkhan was to be published a week before its actual publication, and would tell me that Taleyarkhan was going to be exposed when that publication came out. I also discovered that Tsoukalas was in direct contact with these competitors and would provide regular email updates to his gang and Putterman and Suslick on the status of efforts against Taleyarkhan. Putterman and Suslick and Walter were on this email distribution list as part of the concerted effort to destroy Taleyarkhan.

18. Because of the actions of Tsoukalas and his gang listed above, and because of other deceitful and malicious behavior too lengthy for inclusion here, my health has been impacted, as well as others in the School of Nuclear Engineering over the years. It is very stressful, and has often left me irritable in my dealings with others after being subjected to the vindictiveness and oppression fostered by Tsoukalas and his gang. I have particularly been disgusted by their treatment of the students of the school of Nuclear Engineering.

19. I believe Taleyarkhan has also suffered immensely because of Tsoukalas and his gang. I would not trust Tsoukalas or his gang.

This affidavit is truthful, and is provided willingly by me, without influence from any other individuals.

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Jere Jenkins