

2/2/2008

If called upon to testify under oath, I would testify as to the following:

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Kealey
Version

I have held the position of Administrative Assistant to the Head of Nuclear Engineering since 12/02. I also act as the office manager for 5 staff and 13 faculty members.

1. After working directly with Lefteri Tsoukalas (former Head) for so many years, in my experience and in my opinion, the way he has handled himself and his position in the School of Nuclear Engineering ("SNE"), he is not trustworthy and he is not honest. I have many experiences that affirm this but this affidavit attempts to discuss a sampling of why I believe he is not to be trusted. On the other hand, in my experience, you cannot find a more trustworthy Professor in the SNE than Dr. Rusi Taleyarkhan. Dr. Taleyarkhan is honest, hard working, and is well-respected and liked by students, faculty and staff.
2. Given that I and others have suffered abuse from Dr. Tsoukalas as Head over the years, I have been eager to get this off of my chest. The information in this affidavit may be shocking to some, but it is all 100% true.
3. The standard joke around the SNE is "How do you know when Dr. Tsoukalas is lying?"
Answer: When his lips are moving."
4. Dr. Tsoukalas' antics were so inappropriate, filled with lies, deceit, and unfair manipulation of fellow faculty, students, and staff that I felt compelled to keep my own detailed personal Journal of events that transpired over the years in the SNE (referred to herein as my "*Journal*" entries with dates and times). As can be seen by these facts, his antics are just too crazy for me to make up.
5. Shortly after coming to work in Nuclear Engineering, it became obvious that there was a very close relationship (an affair) between Dr. Tsoukalas and Dr. Jevremovic. She would come down to his office, close the door and spend 30 minutes to 1 hour, several times a day. When we would go out to department luncheons, other staff and I would witness them eating off of each others; plates. They would always sit next to each other and cozy up to each other. Students commented that they would see Dr. Tsoukalas and Dr.

Jevremovic at conferences walking arm and arm together. The students and we all knew that Dr. Tsoukalas was married and were shocked that they were so open about what was going on. It was at this point that the staff and students, as well as other faculty, began to lose respect for Dr. Tsoukalas.

6. It is important to note that two camps developed in the SNE. One, headed by Dr. Tsoukalas, included, of course his girlfriend with whom he was having an affair, Dr. Tatjana Jevremovic, but also Professors Chan Choi, Mamoru Ishii, Martin Bertodano, Frank Clikeman, Karl Ott, Takashi Hibiki, and even extended to former Dean Linda Katehi. Also a part of Dr. Tsoukalas' camp was Josh Walter and Anton Bougaev, his students. These faculty that continuously caused problems for the other faculty, staff and students, have been nicknamed the "Mafia" by the students, and some in the SNE also refer to them as the "Mafia." The students shared with the staff that 2 of the "Mafia", Dr. Choi and Dr. Jevremovic, have often spent an entire class time: "airing the department's dirty laundry", "speaking openly about Dr. Taleyarkhan being a fraud", and "maligning the staff". The students complained that they were very uncomfortable with such open malice. They complained to the staff that they paid a lot of money for an education that they thought they were not getting.
7. The other camp, and more trustworthy camp, includes Professors Shripad Revankar, Dr. Taleyarkhan, Tom Downar, Ahmed Hassanein, Alvan Solomon, Jean Paul Allain and Igor Jovanovic. These Professors often stand for what is right, for sound scientific research, and merit-based operation of the SNE. Unfortunately, I have witnessed first hand, day in and day out, how they have had to endure the malicious practices of the Mafia over the years.
8. It would be ironic if Dr. Tsoukalas discussed any misuse of funds by Dr. Taleyarkhan given Dr. Tsoukalas' rampant misuse of funds regularly as the Head of the SNE. Dr. Tsoukalas often was gone on personal travel on Purdue time and did not complete the appropriate/required travel documents. He would often be out of the country to Greece to visit his estranged wife and kids, for example, or in other countries, often claiming it was for a conference on Purdue time.
9. His misuse of funds in SNE was well known by me, and other staff of the SNE. For example, Dr. Tsoukalas often allowed Dr. Jevremovic to charge expenses to the department for herself (i.e. business travel, costs for publishing her book, \$1200 showcase for her and her students to use, etc.). This same privilege was not given to other faculty. His misuse of funds and abuse of power continued when he would always require his faculty to complete both personal and business travel documents 2 weeks in advance. He only enforced this rule on certain faculty members as an abuse of his power. Often Dr. Ishii and Dr. Jevremovic would complete the travel forms either days before they left on travel or when they returned. Dr. Tsoukalas often refused to sign travel documents for Dr. Downar, Dr. Taleyarkhan and a few of the other faculty when they did not turn them in 2 weeks prior to traveling. (*Journal 8/11/05 & 8/29/05*)
10. Dr. Tsoukalas often refused to review/sign-off proposals for certain faculty (i.e. Dr. Downar, Dr. Taleyarkhan and Dr. Revankar) risking their chances of obtaining funding. Other faculty (i.e. Dr. Ishii and Dr. Jevremovic) would submit proposals that Dr.

Tsoukalas would sign-off on and not even review them. Dr. Tsoukalas had a policy that all faculty were required to budget 5% of their academic salary on all proposals when allowed by the sponsor. Dr. Jevremovic would budget her salary but Dr. Tsoukalas would not always make her charge her time, allowing her to use the budgeted funds for other things. (*Journal 8/19/05*).

11. Perhaps the most blatant abuse of his power and misuse of funds came in 2005 when it came time for Dr. Tsoukalas to decide salary raises for SNE. For 2005, he withheld raises from several faculty members that he didn't like while giving an enormous 10% raise to Professor Dr. Jevremovic. Dr. Tsoukalas made some crazy story about why Dr. Jevremovic deserved a 10% raise, and Dean Katehi (also in his camp) approved the raise. Everyone in SNE was shocked to learn of the raise when faculty raises (unbeknownst to Dr. Tsoukalas) were reported in the Purdue paper for the first time that year. It was discovered that Dr. Jevremovic received the raise while others received no raise. Normal raises are approximately 2% - 3%. I know Dr. Taleyarkhan, Sean McDeavitt, and Solomon were just some of the faculty I remember that did not receive a raise. In my opinion, Dr. Jevremovic did not deserve that substantial of a raise, as she did not add that significantly to the SNE research funds, did not publish extensively, and did not perform any meaningful research for the SNE. On the other hand, if anyone should have received a raise it should have been Professor Karen Vierow who did all those things in spades. She received no raise. This was just one of many examples of blatant and unfair favoritism that Dr. Tsoukalas gave to Dr. Jevremovic over the years. Dr. Tsoukalas was caught red handed, however, because he did not know those raises would be published publicly that year.
12. The ultimate breakdown between Dr. Tsoukalas and Taleyarkhan occurred during Dr. Jevremovic's promotion meetings. Dr. Taleyarkhan, Downar, Solomon and others were most vocal against promotion of Dr. Jevremovic. Dr. Taleyarkhan always voted his conscience and he argued against her promotion around October of 2005. The primary committee, consisting of the top Professors in the department, would meet to discuss promotions and tenure of junior faculty. Dr. Taleyarkhan, Downar and Solomon were on that Primary Committee, along with others from Dr. Tsoukalas' camp. When Dr. Taleyarkhan voted against her promotion around October 2005, that's when Dr. Tsoukalas really got mad at Dr. Taleyarkhan: it was the beginning of the end of Dr. Taleyarkhan as far as Dr. Tsoukalas was concerned.
13. For example, Dr. Tsoukalas wrongfully and maliciously wrote up Dr. Taleyarkhan for breaching confidentiality in telling Solomon what transpired in a Primary Committee which Solomon missed because he was out of town. Solomon was angry that Dr. Tsoukalas had "stacked the Primary Committee" by holding a meeting purposely when Solomon was out of town. In fact, Dr. Tsoukalas would ask us when Professors were out of town or taking vacation and purposely schedule meetings so that they could not be present. Dr. Tsoukalas is so keen on telling us about confidentiality, but he is the worst one in the department about being confidential about anything.
14. When Dr. Tsoukalas heard it from Solomon, he retaliated against Dr. Taleyarkhan by writing him up for breaching confidentiality of a Primary Committee meeting when Dr. Taleyarkhan told Solomon, who missed the meeting, about events that had transpired at

the Dr. Jevremovic promotion meeting. I and others did not understand how this was a breach of confidentiality since Solomon was a Primary Committee member. Despite this, Dr. Tsoukalas wrote up Dr. Taleyarkhan and placed the write up in Dr. Taleyarkhan's file in an attempt to discredit Dr. Taleyarkhan and as retribution for voting against his girlfriend, Dr. Jevremovic. I was so disgusted that Dr. Tsoukalas did this, as he was just looking for something to blame on Dr. Taleyarkhan, no matter how ridiculous it was.

15. Dr. Tsoukalas often engages in fraudulent activity, especially when it came time for promoting Dr. Jevremovic. (*Journal 10/3/2005*). The normal process for a promotion document - prior to a Primary Committee (PC) meeting; the faculty member who is up for promotion is required to complete the President's Form 36 (promotion document). They would then forward the completed document to me via email, to review for completeness. I then make the necessary copies for each PC member to review during the meeting/discussion. In the case of Dr. Jevremovic and Dr. McDeavitt's promotion, Dr. Tsoukalas prepared the documents, not letting me review and later asked me to destroy documents. Because I knew he was out of line and acting unfairly, I still have those documents. (*Journal 10/3/05, 10/4/05 & 11/21/05*)
16. On October 3, 2005, Dr. Tsoukalas committed one of the most blatant acts of fraud I have seen. On that day, he asked me to destroy all copies of my version of the promotion documents and letters of support for Professors Dr. Jevremovic and McDeavitt who were up for promotion. He lied by telling me it was now required by Indiana law to destroy my records. I didn't believe that excuse and I knew he was lying when I saw what happened next.
17. He said he would handle sending out the letters for recommendation that were to be included in the promotion packages for Dr. Jevremovic and McDeavitt. This was highly unusual as I normally handled sending out those letters for the SNE. This was the first time I was asked to not handle these promotion packages (which is part of my job) and to destroy my emails and records. (I kept them anyway).
18. I could not believe the fraudulent activity that happened next. I personally saw that Dr. Tsoukalas manipulated the letters for recommendation of McDeavitt by asking for recommendations for a promotion that McDeavitt was not up for. McDeavitt, an associate professor, was actually up for "associate professor with tenure". However, Dr. Tsoukalas maliciously altered the letters for recommendation I had made to state that McDeavitt was wrongly up for "full professor with tenure," a much higher promotion and a promotion that McDeavitt was sure to fail given his lack of experience and youth. The recommendations uniformly came back recommending that he not be promoted for that position. This led to McDeavitt not being promoted to the desired "associate professor with tenure" due to Dr. Tsoukalas' outright fraud in altering documents maliciously.
19. With regard to Dr. Jevremovic, not only did Dr. Tsoukalas stack the votes at the Primary Committee meetings, but he also deliberately removed adverse letters of recommendation from Dr. Jevremovic's promotion packet. He did not know that I knew this.

20. What's worse, after sending the promotion packet to Dean Katehi for Dr. Jevremovic on October 3, 2005, Dean Katehi sent the packet back to Dr. Tsoukalas. Dr. Tsoukalas then requested an extension to resubmit Dr. Jevremovic's promotion package and was given until noon to do so. Right away, Dr. Jevremovic was called into Dr. Tsoukalas' office and with the door open, was on a laptop at Dr. Tsoukalas' table, with her promotion package sitting next to her, making revisions to her own promotion package and with Dr. Tsoukalas helping her. Dr. Tsoukalas then, oddly, printed his own copies of the revised promotion package on a printer and placed them in an envelope. He asked Lori Flora, SNE secretary; to hand deliver the materials to Dean Katehi. It should be understood that Dr. Tsoukalas repeatedly told me, and ingrained this in me, that he demanded that candidates NEVER be allowed to see their own promotion packages as they are highly confidential. With Dr. Jevremovic, he made a special and unfair exception. This is another example of Dr. Tsoukalas breaching confidentiality yet again, while demanding others to be confidential.
21. The end result was Dr. Tsoukalas gaining the promotion of Dr. Jevremovic and completely tanking McDeavitt's promotion, all by his fraud.
22. I know that Dr. Tsoukalas improperly stacked the Primary Committee promotion votes for McDeavitt, Dr. Jevremovic, and Revankar by holding Primary Committee meetings on their promotion at times when he knew opposite-camp faculty members could not be present. I believe that Dr. Jevremovic did not deserve her promotion and that Dr. Taleyarkhan voiced his opposition for good reasons. I believe that McDeavitt and Revankar were also cheated by Dr. Tsoukalas out of their promotions. I believe Dr. Taleyarkhan spoke his mind because he is honest, and now is paying the price because he didn't go along with the "Mafia."
23. Dr. Tsoukalas would often meet with Dr. Ishii & Dr. Choi prior to a Primary Committee meeting to discuss how they would vote on a promotion case. (*Journal 9/21/05*) He once even met with Dean Katehi prior to an Engineering Area Promotion Committee ("EAPC") meeting and told her that they did not want Dr. McDeavitt or Dr. Revankar's case to go forward. This was highly unusual and wrong. He came back to the office and even bragged that neither case would go forward because the majority of the EAPC would follow Dr. Katehi's lead.
24. It would be surprising to me if Dr. Tsoukalas claimed that Dr. Taleyarkhan manipulated any of his students. That is not Dr. Taleyarkhan's nature at all and could not be more opposite. If anything, it is Dr. Tsoukalas that manipulates students. For example, two undergraduate students, John Hopkins and Felisa Limon, approached me after 5:00pm and told me that Dr. Tsoukalas, Dr. Jevremovic and Dr. Choi (separately) approached them and asked them to write a letter to Dcan Jamicson because Nuclear was left off of the rankings in the US News and Report magazine. They said they felt uncomfortable about it, but that as students they felt they couldn't refuse them without somehow suffering. Their quote was, "What are we going to do, refuse? Yaw, right." (*Journal 8/23/06*)

25. During the time that Dr. Tsoukalas was causing extreme undo stress for Drs. Vierow, McDeavitt and Downar, he would often tell the secretary and I that he did not want to talk with any of the faculty, except Dr. Jevremovic and Dr. Ishii. They were always allowed to interrupt him at any time. I witnessed times when Dr. Ishii and Dr. Jevremovic would interrupt scheduled meetings between Dr. Tsoukalas and students. They would ask the students to excuse themselves while they spoke with Dr. Tsoukalas. Often the students would have to leave for a class before they were able to finish their meeting with Dr. Tsoukalas.
26. Dr. Tsoukalas continuously maligned some of the faculty (i.e., Professors Taleyarkhan, Downar, McDeavitt and Revankar) in discussions that he had with other staff and I. He would refer to them in a discriminatory fashion, using such words as, "stupid," "ignorant," "idiot," "liar," "thief," "fraud," "stupid Indian(s)," and "useless Indian(s)." Often he would talk about Dr. Revankar, Dr. Taleyarkhan and Dr. Gore (all of Indian descent) and would categorize them together, saying each was one of "them." On more than one occasion, he told me how he hated Gore and hated Indians.
27. If Dr. Tsoukalas has claimed that he never made statements to anyone that Dr. Taleyarkhan committed fraud or fabricated experiments, that would be a lie. I know of at least one occasion, at a departmental party that Dr. Tsoukalas was talking loudly and blatantly about Dr. Taleyarkhan and his alleged fraud in research. I remember I actually moved Dr. Tsoukalas away from the students to avoid the impropriety, and to keep Dr. Taleyarkhan from hearing, as he was standing near by.
28. Also, Dr. Tsoukalas would routinely bring up Dr. Taleyarkhan and fraud at faculty meetings where Dr. Taleyarkhan was present, and which I attend to take notes. It was obvious that Dr. Tsoukalas was trying to turn people against Dr. Taleyarkhan. At one point Revankar even jumped in and said such malignment should stop and that it was not appropriate to discuss in a faculty meeting.
29. With regard to Dr. Tsoukalas, he also talked directly to me and Lori Flora, the secretary, about Dr. Taleyarkhan's alleged research fraud. He would go so far as to tell us, "Don't get used to Dr. Taleyarkhan being around, he will be in a federal prison soon."
30. I know Dr. Tsoukalas spread rumors about Dr. Taleyarkhan and fraud in his research to *Nature*, *New York Times*, and *Journal and Courier*, the local paper. As usual, Dr. Tsoukalas is terrible about keeping things confidential. Many of us felt this was inappropriate and that he really did not care about the SNF. He was only concerned about his vindictiveness. Often when Dr. Tsoukalas would talk to reporters about fraud with Dr. Taleyarkhan's research, he would leave town (out of the country) to avoid calls from other reporters.
31. This happened especially with regard to the *Nature* article of 3/8/2006. The *Nature* article published on 3/8/2006 quotes Dr. Tsoukalas and Dr. Jevremovic in allegations against Dr. Taleyarkhan, his research, and his moral and ethical character. Shortly after the *Nature* article was published, we received a substantial amount of calls from reporters trying to ask questions about it. Dr. Tsoukalas was at that time out of the Country (his usual practice after talking to reporters about Dr. Taleyarkhan, so that he could avoid

questions from the press. The calls were so great in number that it forced Dr. Jevremovic to come to the main office where I was. She came to talk with me and Lori Flora to get away from the calls. She turned to us, crying, stating "I'm really not such a bitch. I only did what I was told by him [Dr. Tsoukalas] in talking to *Nature*. Now I'm here all alone to deal with all this [reporter telephone calls] and it's not fair." This clearly signaled to me and Lori, who was present, that Dr. Tsoukalas made Dr. Jevremovic say the things she said to *Nature*. I was not surprised that Dr. Tsoukalas would do that (it is his nature), but I was surprised because I had never seen Dr. Jevremovic cry.

32. We did not believe the allegations in the *Nature* article for many reasons. First, the claim that Dr. Taleyarkhan stole equipment from the lab is completely unbelievable. For Dr. Tsoukalas to say that Dr. Taleyarkhan stole the equipment must be false because Dr. Tsoukalas always knew what was going on in the department . . . always. I am sure he knew the equipment was to be moved from the lab and that Dr. Taleyarkhan did not "steal" it. Dr. Tsoukalas probably ordered the equipment to be moved. Also, it was unbelievable to me and strange that Dr. Tsoukalas would go to the press with this allegation. If someone really stole something, such an egregious act would cause Dr. Tsoukalas to tell everyone in the department. In this case, however, he told no one, and told the press first which was odd to us in the department who knew Dr. Tsoukalas. Plus, for Dr. Jevremovic to allege research fraud against Dr. Taleyarkhan in *Nature* made me and others laugh because we know Jevremovic is not an experimentalist, and that she has no right to criticize research when she herself does not know about experiments herself. Finally, it is just not in Dr. Taleyarkhan's nature to steal things. It is my opinion, that the entire *Nature* article was falsely concocted by Dr. Tsoukalas as an attempt to discredit Dr. Taleyarkhan.
33. I was aware that Dr. Tsoukalas formed a secret committee composed of Choi, Clikeman, Ott, Bertodano and Ishii who were assigned by Dr. Tsoukalas to investigate Dr. Taleyarkhan for research fraud. Dr. Tsoukalas attempted to keep himself separate from that committee, but often times he met with the committee and I remember him attending the committee meeting when they called in Adam Butt. As far as I know, it was Dr. Tsoukalas that called Adam Butt into his office to meet with the secret committee and Adam Butt did not approach Dr. Tsoukalas. Dr. Tsoukalas was heavily involved in forming and participating in that committee despite his efforts to tell us he was not involved.
34. I learned that the University told the secret committee to eventually disband because their committee was improper and such charges would have to be brought at the college or university level. A report of the committee was put in Dr. Taleyarkhan's file. As far as I know, that committee did not make itself known to Dr. Taleyarkhan, it was all done behind Dr. Taleyarkhan's back.
35. Dr. Jevremovic and Dr. Tsoukalas would sometimes harass students that worked for Drs. Taleyarkhan, Downar and Revankar. Some of the students felt that their grades suffered because of the professor they worked for.
36. Prior to Dr. Vierow leaving ~~her position at Purdue~~, Dr. Tsoukalas was talking with the secretary (Lori Flora) and me and ~~started~~ telling us a story about Dr. Downar and Dr.

Vierow having had an affair. He said that the real reason Dr. Vierow was leaving is that Dr. Downar dumped her and Dr. Vierow didn't want to continue working with Dr. Downar. After Dr. Tsoukalas left, I called the secretary into my office and told her that she was not to pass that information any further. We both agreed that we didn't believe the story. I felt it was just Dr. Tsoukalas trying to once again discredit Dr. Downar and Dr. Vierow's character.

37. Dr. Choi accused me of being a liar and a thief. The secretary Kellie told me that Dr. Choi came and told her (in front of his visitor) that one of the department projectors had come up missing. The department projectors are stored in my office (since I have a door that locks). Dr. Choi said that since I was the only person with a key to my office it seemed very suspicious. Kellie told him that I wasn't the only person who had a key to my office, but he and his visitor still proceeded to have a conversation in the front office about how it had to have been an inside job. (*Journal 7/16/07*)
38. Dr. Downar told me that Dr. Ishii asked him to join him for lunch at Heisei Restaurant. During lunch Dr. Ishii starting telling Dr. Downar that he needed to drop the idea of speaking to the Dean about Dr. Tsoukalas and Dr. Jevremovic's inappropriate relationship. Dr. Ishii suggested that they just let Dr. Tsoukalas have his fun and that would give them something to hold over the Head so they could get what they wanted, when they wanted it. Dr. Downar said that since the students had started talking about it, he felt that it was in the best interest of the department/school to deal with the issue. Dr. Ishii became very angry with Dr. Downar and asked him to leave. Dr. Downar did not even have the opportunity to eat his lunch.
39. The antics of Tsoukalas and his camp have caused me great hardship and have even affected my health. It would not surprise me to learn that Dr. Taleyarkhan suffered more significant hardship and ill health given the wrongful, malicious acts Dr. Tsoukalas and his camp have taken against Dr. Taleyarkhan.

This affidavit is being completed and signed willingly and without influence or duress from any other individuals.

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