

Affidavit – February 2, 2008

My name is Erica Timmerman and if called upon under oath, I will testify that the following is completely true and accurate.

I came to Purdue in April 2002 as the Secretary to the Dean of Engineering for Linda Katehi. From there I went to Nuclear Engineering in November 2002 to work as the Secretary in the main office. During that time, I had built relationships with many of the faculty and even several students in Nuclear Engineering. I had a lot of respect for them. I spent 2 years in that position before moving to Electrical Engineering in November 2004 because I wanted to work more closely with the students. While I was in Electrical Engineering I kept in close contact with Darla Mize. In addition Dr. Choi actually came to me on one occasion and made it clear that he wanted me back in the Nuclear Engineering department. The Administrative Assistant for Student Services position became open in March 2006 and I applied and was offered the job in April 2006. I have continued to work in the same position.

Based on my experiences and what I have observed, I believe Dr. Lefteri Tsoukalas is deceitful and vindictive and in general a jerk. It tears me up because when I first came to Nuclear Engineering I really thought he was a great guy, but his true side was revealed on so many occasions that he is absolutely the most untrustworthy person I know.

I have never had any problems with Dr. Taleyarkhan. He has also been very kind and attentive and I know from dealing with students on a daily basis that he was also good with the students. While I cannot testify about his research I can testify about his character and I believe that Dr. Taleyarkhan is a great guy with morals and very respected by the staff and students as well as the faculty who are not in the Tsoukalas hate group. The Tsoukalas group or hate group is also referred sometimes by those of us that know them as the “Mafia.” Tsoukalas’ group truly operates like a mafia.

I lost a lot of respect for Dr. Tsoukalas about a year after I started in Nuclear in November 2002 in the main office. It became very clear that something was going on between he and Dr. Jevremovic. In my opinion, an affair, as it was obvious they were more than colleagues. In 2003, it became more clear as I would witness them coming in on multiple mornings together and leaving in the evenings together. They were constantly going to each other’s office, mostly she was in the Head’s (Tsoukalas’) office in the main office.

I witnessed Dr. Tsoukalas abuse his power by manipulating students and faculty. For example, he supported many of Jevremovic’s students on the department funds but declined supporting certain other professor’s students for no good reason. The students (and even the janitors) caught on very quickly to their “relationship” as well and came to us (myself and Darla Mize) very concerned about the school’s reputation, as were we. We thought this reflected horribly on the school and many students complained. They stated they (Tsoukalas & Jevremovic) would go to conferences together and be inseparable as well as eat off each other’s plates. One of the student’s even lived within

site of Dr. Jevremovic's house so several students made it a game to see how many nights Dr. Tsoukalas' car would be there all night. It was very embarrassing to staff, faculty and students.

I made the decision to return to Nuclear in April 2006 because it was a good career move for me. I thought I could ignore what was going on and do my job without worrying about what was going on within the department.

On July 18, 2006 I had my first experience that concerned me very much and made me question my decision on returning to Nuclear Engineering. I had a meeting with Darla & Dr. Tsoukalas about teaching assignments for the fall. After going over a few things Darla asked about adjunct professor positions for Drs. Vierow & McDeavitt because we needed to get them certified at the graduate school to serve on their student's advisory committees. Dr. Tsoukalas was very mad about it and made it clear we do not GIVE out adjunct positions, especially to faculty who are leaving us for better things. He also indicated there was no reason for McDeavitt to even be an adjunct because he doesn't have anything left here. He stated that adjunct positions are for people who want to help our school, almost honorable positions, and must be reviewed by the search committee.

I had previously worked with both Dr. McDeavitt and Dr. Vierow so I was floored by this. They were great professors and the students really liked them. I had never heard anything negative about them before.

It is absolutely untrue that Dr. Tsoukalas never spoke about Dr. Taleyarkhan and fraud to anyone. On August 15, 2006 Dr. Tsoukalas stopped by my office to discuss courses. He instructed me not to cancel any of the courses yet until we saw if 7 students registered, which he indicated he doubted. He said he would let the Dean make the decision to cancel Dr. Taleyarkhan's class because he (Tsoukalas) "didn't want to get involved in all of that mess with Taleyarkhan." Someone stood outside my office at this point who I believe was Dr. Jevremovic (due to the heels) so Dr. Tsoukalas shut my door. He told me about the Dr. Taleyarkhan investigation: that there was a group of 3 people who were top secret who were investigating. This group decided it should be investigated further so a group of 5 (or 7?) was pulled together and had 3 months to complete their investigation. He then went into detail about what they were investigating: that Dr. Taleyarkhan had used this device which he hid on a table to make neutrons show up in his experiment. Also, that Dr. Taleyarkhan had written papers in January that were independent studies supporting Dr. Taleyarkhan's findings and he put Yiban Xu and Adam Butt's name on the papers without their knowing. He said Adam found out and came to Dr. Tsoukalas about it. He also said Dr. Taleyarkhan would be investigated by the government because he used government money on all of the equipment and salaries, but didn't name them in the papers because he knew they were false. He said once they found him guilty he would never find a job here (meaning in the US) and would be forced to go back to India. But he wouldn't be able to show his face there either so he would have to live in the shadows far away from towns and the public. He also said Dr. Revankar put his name on one of Dr. Taleyarkhan's papers. He (Tsoukalas) wasn't sure why, but thought Dr. Taleyarkhan had bullied him because they were both from India and Dr. Taleyarkhan was

on the primary committee and could get him promoted. (That's not like Dr. Taleyarkhan at all, by the way). Dr. Tsoukalas went on to say that Dr. Revankar hasn't published a single paper since his last promotion & we don't promote someone who does that. He then went on to say that Dr. Taleyarkhan had convinced Dean Gore to do some things and Dean Gore was probably doing it because he was from India, too. Dr. Tsoukalas said he (Dean Gore) would eventually get in trouble, too. He said that no one realized how serious it was because the Provost didn't want any negative publicity because she wanted to become the next president. She is hoping Dr. Taleyarkhan would just leave and they could close the investigation without everyone knowing. Dr. Tsoukalas said they should have listened to him over the past two years. He said he had been trying to tell them about Dr. Taleyarkhan.

I was in shock and disbelief after he left my office. At this point I lost any respect I had left for Dr. Tsoukalas. It was one thing to tell me about the investigation, but to make comments about Indians, that really upset me. I realized at this point just how serious this was and that Dr. Tsoukalas would go to any distance to bring Dr. Taleyarkhan down no matter how he did it.

On August 23, 2006 Dr. Tsoukalas asked me to come to his office. He asked me about one of our past students and wanted the student's records. He said that this student had worked with Dr. Downar as a post doc after graduating, but something had happened between the two of them over PARCS (Downar's research) and the student left. However the student struggled to find a job because of Dr. Downar and that the student had committed suicide and Dr. Tsoukalas thought it was because of what happened with Downar. I think this was just another story by Tsoukalas to discredit another fellow faculty member. He has a repeated history of wrongfully discrediting other faculty in the Nuclear Engineering department.

On August 24, 2006 Dr. Choi requested that I switch two class times as he had cleared it with his class and Dr. Jevremovic was clearing with her class that afternoon. I informed him the class time he had requested was considered an "illegal time" according to the sheet I had for scheduling. He told me I was to do whatever I had to do to get it changed, "Tell them it is a seminar; lie if you have to,"

On September 5, 2006 Darla & I met with Dean Jamieson per our request. She expressed her concerns over what was going on in the department and was aware of the situations and apologized for what we were going through. She gave us her word that if we were pushed out of the school she would get us a position somewhere else in engineering so we should not worry about that. She also told us to come to her if we were asked to do anything uncomfortable.

On September 18, 2006 Kellie Reece (main office secretary) informed me that Dr. Choi had sent an email about a link on the NE website for Dr. Taleyarkhan's sonofusion lab. A student had brought it to Dr. Choi's attention and he responded that he would bring it to the attention of head and website specialist for immediate action.

On September 19, 2006 I talked to Kellie and she said she implied that it was to be removed, which was exactly what I thought. I talked to Darla about it and she suggested I forward it to the Dean to make the decision.

On September 20, 2006 the Dean responded and said to do as requested by Professor Choi and not to get in the middle of it. That she would look into it and communicate with Dr. Choi & Dr. Tsoukalas. I therefore removed the link from our website per her instruction. That afternoon I started to panic because Dr. Choi didn't specifically say to "Remove the link" even though it was implied. I talked to Darla and she told me to put the link back up and wait for Dr. Choi or directly tell me to remove it.

On September 21, 2006 Dr. Choi confronted Kellie & I about the situation. He said that somehow the Dean had got the email and was trying to "create a war in our department". He showed us the email he received from the Dean instructing them to not make any decisions about anything pertaining to Dr. Taleyarkhan before getting it cleared through her. Dr. Choi asked us if we knew anything about it and we both said no. He said he never directly said to remove the link even though the email implied it. I told him that I didn't know anything and didn't want to be involved in it. I did not want to lie, but I honestly feared for the retaliation if I said that I did send it to the Dean. I was trying to do the right thing for Dr. Taleyarkhan, whom we all respect and admire. We had seen Dr. Choi on numerous occasions be very hateful and mean and I did not want to go through it.

In the Fall 2006 we had an applicant, Thomas Adams who applied for graduate school to work under Dr. Taleyarkhan. I handle all of the applications personally. This student was from Crane Naval Surface Warfare. After the Graduate Committee reviewed his application, Dr. Choi looked at the overall comments and asked that Mr. Adams take the GRE, which he agreed to do. Mr. Adams emailed his un-official GRE scores to Dr. Taleyarkhan and the application was brought to the table at the Graduate Committee meeting on December 5, 2006. Dr. Taleyarkhan agreed that he might not be as strong, but he was coming already funded as well as the fact that we had admitted a similar student, Jack Fulton and that student would soon be receiving his PhD. The committee agreed to admit Mr. Adams with multiple conditions and as a MS seeking student.

I believe they didn't want to bring any question into Jack Fulton's file because Jack should never have received a PhD. It is very clear that you cannot obtain a graduate degree in NE on-line, however Jack worked with Dr. Tsoukalas who allowed him to do "Independent Studies" (NUCL 597 / 697) for 18 of his 30 credit hours for which he was not present on campus. I was told when I started that a student could only use 2 three-credit "Independent Study" courses on their plan of study. These courses were taken on his own under the direction of Dr. Tsoukalas with the exception of one, which was done under the direction of Dr. Jevremovic. Our graduate manual indicates a student must include at least three 600-level courses on their plan of study (Jack had 1 course at the 600-level, which was the 697 Independent Study). Also, according to our graduate manual PhD students are supposed to take 6 credits of mathematics or computer science, which Jack did not take any, nor is there any record indicating the Graduate Committee

waived this requirement. The Graduate School allows 12 credits to be transferred from non-degree, which Jack did before gaining admission into NE, however Dr. Tsoukalas requested a waiver of this requirement to allow Jack to use 18 credits of his non-degree work. Dr. Tsoukalas also requested the "B" or better requirement be waived as Jack received a "C" in Nuclear 551. Upon Jack defending his thesis Jack made several trips to meet Dr. Tsoukalas on campus to go over his final thesis. Jack commented several times that he was waiting on Dr. Tsoukalas to finish this or write that, indicating many times that Dr. Tsoukalas was actually writing his thesis for him. In my opinion we handed Jack Fulton a PhD for doing no work. I believe Dr. Tsoukalas wrote Fulton's thesis and wanted to get money and equipment from Crane by letting Jack slide under the radar getting his PhD as a "trade". I know for a fact that Jack organized some equipment be shipped to NE from Crane. This left me feeling very uneasy, and distrustful of Dr. Tsoukalas.

I have never seen Dr. Taleyarkhan manipulate or pressure anyone, much less a student. I cannot say the same for Tsoukalas and his group. Just yesterday (February 1, 2008), I spoke with a student who was betrayed and manipulated by Dr. Tsoukalas and Dr. Jevremovic. Godfree Gert was highly recruited by Dr. Tsoukalas and subsequently admitted into our graduate program to work under the direction of Dr. Tsoukalas according to his offer letter. Once Godfree came to Purdue he was immediately pushed into Dr. Jevremovic's group because she needed students. Godfree was very upset and torn because he had signed on to work with Dr. Tsoukalas but he tried to work with Dr. Jevremovic. In 2006 he even contemplated leaving Purdue without a degree because he didn't believe in her work or want to be associated with her whatsoever. However he didn't want to have wasted all of the time he put into getting his degree. The reason I spoke to him yesterday was because he defended his final examination this past fall and Dr. Jevremovic is refusing to sign his form. The Graduate School has requested it be submitted by Monday, February 4. Godfree called me to find out about switching advisors to complete his PhD because Dr. Jevremovic would not sign his form to let him graduate. He is the only one suffering in this situation. Godfree is just one of many students who have suffered in our department at the hands of Tsoukalas and his group.

When Tsoukalas stepped down as Head from the Nuclear Engineering department, we all knew that he was asked to step down. However, Tsoukalas tried to claim to everyone, and to this day, that the reason he stepped down is because he did not want to be involved with Taleyarkhan and his research under his direction. We all know this to be another one of Tsoukalas' stories.

This affidavit is completed willingly without any influence or duress by any other individuals.



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