

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.

