

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

RUGGERO SANTILLI and CARLA
SANTILLI,

Plaintiffs,

vs.

Case No.
8:187-cv-1797-T-33
MAP

PEPIJN VAN ERP, et
al.,

Defendants.

VIDEOTAPED

DEPOSITION OF: CARLA SANTILLI

DATE: April 16, 2018

TIME: 1:35 p.m. to 4:17 p.m.

PLACE: Riesdorph Reporting Group
3411 Alt. 19 North
Palm Harbor, Florida

PURSUANT TO: Notice by counsel for Defendants
for purposes of discovery, use at
trial or such other purposes as
are permitted under the Federal
Rules of Civil Procedure

REPORTED BY: Aaron T. Perkins, RMR, CRR, CRC
Notary Public, State of
Florida at Large

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1 APPEARANCES:
2
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8 Attorney for Plaintiffs

9 JAMES B. LAKE, ESQUIRE
10 Thomas & LoCicero, P.L.
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13 Attorney for Defendants

14 ALSO PRESENT:
15 Dave Fuhrmann, videographer
16 Ruggero Santilli
17
18
19
20
21
22
23
24
25

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1 THE VIDEOGRAPHER: This is DVD No. 1 to the
2 videotaped deposition of Carla Santilli in the
3 matter of Ruggero Santilli and Carla Santilli vs.
4 Pepijn van Erp et al., Case
5 No. 817-cv-1797-T-33MAP.
6 This deposition is being held at Riesdorff
7 Reporting Group, 3411 Alternate 19 North, Suite A,
8 Palm Harbor, Florida.
9 Today's date is April 16, 2018, and the time
10 is approximately 1:35 p.m.
11 My name is David Fuhrmann. I am the
12 videographer. The court reporter is Aaron
13 Perkins.
14 Counsel, will you please introduce yourselves
15 for the record?
16 MR. PARRISH: Joseph Parrish for the
17 plaintiffs.
18 MR. LAKE: James Lake, counsel for Defendants
19 Pepijn van Erp and Frank Israel.
20 THE VIDEOGRAPHER: Will the court reporter
21 please swear in the witness and we will proceed.
22 CARLA SANTILLI,
23 the witness herein, being first duly sworn on oath, was
24 questioned and testified as follows:
25 DIRECT EXAMINATION

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1 BY MR. LAKE:
2 Q. Mrs. Santilli, good afternoon.
3 A. Good afternoon.
4 Q. Again, for the record, although we met this
5 morning, my name is James Lake, and I appreciate you
6 being here today for me to ask you some questions about
7 the -- about the case.
8 I will reiterate the instructions I gave
9 Dr. Santilli. And I know you were here for them, but
10 just so everybody is clear, if any question I ask is
11 unclear or confusing in any way, please let me know and
12 I will try to clarify that for you. Okay?
13 A. Okay.
14 Q. Thanks.
15 And then, again, if a break is needed for any
16 reason at any time, just let me know --
17 A. Okay.
18 Q. -- and we'll be happy to take a break. Thank
19 you.
20 Have you had your deposition taken before?
21 A. No.
22 Q. Okay. What did you do to prepare for this
23 deposition?
24 A. I prepared -- actually, I didn't need any
25 preparation, because I provided a lot of information,

<p>Page 10</p> <p>1 and I have been looking at this case for seven years, 2 so I'm well prepared -- 3 Q. Okay. 4 A. -- I think. 5 Q. Okay. With regard to the deposition in 6 particular, did you meet with Mr. Parrish? 7 A. No. Well, a few minutes before. 8 Q. Okay. 9 A. That's all. 10 Q. Okay. All right. As I think you know, three 11 depositions were taken last week in this case -- 12 A. Yes. 13 Q. -- of Mr. Wainwright, Mr. Tadsen, and Ermanno 14 Santilli. 15 A. Yes. 16 Q. Have you had a chance to talk to them about 17 their depositions? 18 A. Today? 19 Q. At any time since then. 20 A. At any time, yes, I did. And not about my 21 deposition. I just asked them how did they feel about 22 it. 23 Q. Okay. 24 A. But I didn't say, you know -- my son 25 basically told me nothing.</p>	<p>Page 12</p> <p>1 A. Yes. 2 Q. Okay. And you're a director of MagneGas 3 Corporation? 4 A. Yes. 5 Q. And since the 1980s, you have been president 6 and chief executive officer of Hadronic Press, right? 7 A. Yes. 8 Q. And I understand that's a physics and 9 mathematics academic publishing company? 10 A. Yes. 11 Q. And in that capacity, I understand you 12 directed the growth of the company from start-up to 13 become one the world's leading physics and math 14 publishing companies, correct? 15 A. Yes. 16 Q. Books and journals published by Hadronic 17 Press can be found in all the leading university 18 libraries around the world? 19 A. Yes. 20 Q. And you've been involved in the private 21 sector, I understand, as a grant administrator and 22 public relations specialist? 23 A. Yes. 24 Q. Specifically, in the fields of academic 25 publishing and environmental sciences?</p>
<p>Page 11</p> <p>1 Q. My son is the same way on other subjects. 2 A. Yeah. He didn't -- he didn't really want to. 3 Plus, you know, you know. And then you've got the 4 other two witness. They said that they had the 5 deposition, and that's it. 6 Q. Okay. Let me ask you a little about your 7 educational background. 8 A. Yeah. 9 Q. And I'm going to try to summarize this in the 10 interest of time. 11 A. Okay. 12 Q. I will tell you this information came from 13 the Thunder Energies 10-K, so I'm pretty confident it's 14 accurate. But if you could just help me -- 15 A. Okay. 16 Q. -- with that. 17 I understand you have a master's from Boston 18 University; is that correct? 19 A. Yes, I do. 20 Q. Okay. And you worked as a community program 21 coordinator for the Commonwealth of Massachusetts; is 22 that right? 23 A. Yes, I did. 24 Q. Okay. Today, you're treasurer, secretary, 25 and a director of Thunder Energies, right?</p>	<p>Page 13</p> <p>1 A. Yes. 2 Q. Great. 3 And I understand you've been an invited 4 speaker at international conferences; is that right? 5 A. No. 6 Q. Well, what I'm thinking about -- let me be 7 more specific. 8 Were you invited to speak at something called 9 the Dreamers Day Conference in Italy in 2016? 10 A. Say it again. 11 Q. Sure. 12 Were you invited to speak at a conference 13 called the Dreamers Day? 14 A. Oh, yes, we did. 15 MR. RUGGERO SANTILLI: But we were not there. 16 THE WITNESS: Yeah. But we didn't go because 17 we were threatened. 18 BY MR. LAKE: 19 Q. Oh, wow. 20 A. And there is a letter somewhere of a document 21 that you just presented. And I forgot about that. 22 There's a letter, an e-mail, by Corda that replies to 23 the blog of Pepijn van Erp when he announced that. And 24 he said they had been invited, and I know they will not 25 be disappointed. So Corda wrote back saying, I'm going</p>

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1 to kick you, da, da, da. You have it in your letter,
2 in one of the e-mail.

3 MR. RUGGERO SANTILLI: My -- my life -- my
4 personal life was threatened during the
5 participation, by Corda and van Erp. They
6 threatened --

7 THE WITNESS: So I'm glad you reminded me of
8 that. So what we did, Ruggero and I, we make
9 videos and send it to them. And the Dreamers Day
10 was a young -- a group of young people in Milan
11 who meet occasionally -- well, every year. Now I
12 don't know if they've met again. But, basically,
13 they meet to kind of help each other, support each
14 other, see that you can dream big things and you
15 can achieve.

16 BY MR. LAKE:

17 Q. Okay. So you --

18 A. That's the only -- yeah.

19 Q. So you did not appear in person --

20 A. No.

21 Q. -- but you sent an e-mail?

22 A. No, no. But we sent a video, yes.

23 Q. Okay. And just so that Aaron is able to take
24 things down, if you would make sure I finish my
25 question before you answer.

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1 written in an e-mail. The e-mail that you
2 mentioned in the back, he said if you don't do
3 this, I'm going to come to Milan and kick you, da,
4 da, da. So that's it.

5 MR. PARRISH: Okay.

6 MR. RUGGERO SANTILLI: I did not because the
7 attorney did not give me time to elaborate.

8 MR. PARRISH: Well, we're going to --

9 THE WITNESS: Yeah.

10 MR. PARRISH: You're not done yet.

11 MR. RUGGERO SANTILLI: Okay.

12 MR. PARRISH: So they're going to come back
13 and ask you more questions later, so you'll have
14 time.

15 MR. RUGGERO SANTILLI: I will be totally
16 silent unless authorized. Thank you.

17 (Exhibit V53 was marked for identification.)

18 BY MR. LAKE:

19 Q. Mrs. Santilli --

20 A. Yes.

21 Q. -- let me show you a document we've marked
22 Exhibit V53 and see if you recognize this.

23 A. Okay. Let me just see it.

24 Q. Please.

25 A. So what am I supposed to do this? Say if I

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1 A. Right, of course, of course.

2 Q. Thank you very much.

3 A. I'm not strong in that, so --

4 Q. I understand.

5 A. I'm a mama, so --

6 MR. PARRISH: Dr. Santilli, just to let you
7 know, when she's got a question, you're not really
8 allowed to answer for her, because then they can
9 say that you're impressing your opinions on her,
10 so --

11 THE WITNESS: Thank you.

12 MR. PARRISH: -- if you could let her just
13 answer.

14 MR. RUGGERO SANTILLI: Thank you for
15 reminding me.

16 MR. PARRISH: Okay. I know you get --

17 THE WITNESS: We are both --

18 MR. RUGGERO SANTILLI: In this case, however,
19 I was personally threatened by Corda and --

20 THE WITNESS: Yeah, we forgot about that.

21 MR. RUGGERO SANTILLI: So this does not
22 appear nowhere so far, you should know. This
23 physical threat does not appear in this -- in
24 this --

25 THE WITNESS: Yeah. It's written -- it's

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1 know it? Because here it talks about Twitter.

2 Q. I was going to ask you some questions. I
3 just want to give you a chance to look at it first.

4 A. Yeah, of course, I know this.

5 Q. Okay.

6 A. Etc., yes. But this is a composite.

7 Q. Okay.

8 A. It's not just one. It's like two pieces
9 together --

10 Q. Okay.

11 A. -- in my opinion.

12 Q. Let me ask you some questions about this.

13 A. Yeah.

14 Q. As I read this document, it's a tweet from an
15 account in the name of Carla Santilli. And the Twitter
16 account name is @hadron1carla.

17 Do you see that at the very top?

18 A. Yes, I do.

19 Q. And that's -- is that your Twitter account?

20 A. Yes, I do. And I recall very well when this

21 was on Twitter. I'm not sure -- I never use Twitter.

22 And since Pepijn van Erp started to tweet that, you can
23 see some Twitters. You see that he tweet underneath.

24 I forgot about this as well. I mean, one more thing.

25 He started to say, Oh, now I see your son is

<p>Page 18</p> <p>1 involved.</p> <p>2 I said, Well, your daughter -- I mean, there</p> <p>3 was a whole thing about the Twitter, and I wasn't able</p> <p>4 to use the Twitter, and I made a mistake and I sent out</p> <p>5 this, which I didn't want to send. So it was an</p> <p>6 error --</p> <p>7 Q. Okay.</p> <p>8 A. -- that I completely forgot.</p> <p>9 This goes where?</p> <p>10 Q. Yes. Where have we got the originals?</p> <p>11 That's perfect. Thank you very much.</p> <p>12 MR. RUGGERO SANTILLI: You should ask for a</p> <p>13 copy.</p> <p>14 MR. PARRISH: We have it.</p> <p>15 BY MR. LAKE:</p> <p>16 Q. Let me ask about some things you, I suspect,</p> <p>17 are familiar with from your experience in the</p> <p>18 publishing industry.</p> <p>19 A. Yes.</p> <p>20 Q. You're familiar with the publisher called</p> <p>21 Springer, aren't you?</p> <p>22 A. Excuse me?</p> <p>23 Q. A publisher named Springer, S-p-r-i-n-g-e-r.</p> <p>24 A. Of course, yes.</p> <p>25 Q. And I think the -- you have some Springer</p>	<p>Page 20</p> <p>1 MR. RUGGERO SANTILLI: Carla -- she's not a</p> <p>2 scientist.</p> <p>3 THE WITNESS: Okay. This is -- okay.</p> <p>4 MR. RUGGERO SANTILLI: Carla, one moment,</p> <p>5 because this is a very serious issue.</p> <p>6 Technically, she's not a scientist, and I object</p> <p>7 to a question, a technical question -- a technical</p> <p>8 question to be asked.</p> <p>9 Attorney Parrish, this is another moment</p> <p>10 which we decide to stay or leave.</p> <p>11 MR. PARRISH: Okay.</p> <p>12 THE WITNESS: And then we go to the judge.</p> <p>13 MR. PARRISH: Okay. We will object to Carla</p> <p>14 testifying --</p> <p>15 THE WITNESS: Yeah. I think I have my own</p> <p>16 objection to this.</p> <p>17 Okay. This is a paper that is written,</p> <p>18 published online. It is an open access paper for</p> <p>19 which I checked, and they pay \$3,000 for</p> <p>20 publication charges. It's written by three</p> <p>21 people: Corda, Katebi, and Schmidt. They tried</p> <p>22 to publish this in several places. And then they</p> <p>23 had to modify it, because the whole article -- the</p> <p>24 whole article were criticizing and saying, "Paper</p> <p>25 dedicated to the 80th birthday of Ruggero Santilli</p>
<p>Page 19</p> <p>1 books there with you?</p> <p>2 A. Well, of course.</p> <p>3 Q. Okay.</p> <p>4 A. We have four or five.</p> <p>5 Q. It has -- it's published, I was going to say,</p> <p>6 at least one, but apparently there are four or five of</p> <p>7 Dr. Santilli's --</p> <p>8 A. No. We have four.</p> <p>9 Q. -- works, right?</p> <p>10 A. Yeah. Two, three, four.</p> <p>11 Q. So it's a respected book publisher, correct?</p> <p>12 A. It is.</p> <p>13 Q. Okay. And I think you already mentioned a</p> <p>14 moment ago that you're familiar with a scientist named</p> <p>15 Christian Corda?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And he wrote an article responding to</p> <p>18 Dr. Santilli's work concerning the general theory of</p> <p>19 relativity, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. I just want to ask you if this appears</p> <p>22 to be a copy of that article.</p> <p>23 A. Okay.</p> <p>24 Q. Let me mark it first.</p> <p>25 (Exhibit V54 was marked for identification.)</p>	<p>Page 21</p> <p>1 with the hope" --</p> <p>2 THE REPORTER: I'm sorry, I can't hear you.</p> <p>3 I'm sorry.</p> <p>4 THE WITNESS: "Paper dedicated to the 80th</p> <p>5 birthday of Ruggero Santilli with the hope that he</p> <p>6 will revise his claim in gravitation and</p> <p>7 cosmology." This was much longer in the other</p> <p>8 paper that they attempted to publish. And they</p> <p>9 even intended to publish in [inaudible], and they</p> <p>10 did not accept it because this was very -- this</p> <p>11 was longer and was very demeaning, so they reduced</p> <p>12 it to this.</p> <p>13 And so -- I'm not a scientist. I'm not able</p> <p>14 to say whether they're right or wrong, but I know</p> <p>15 the story of this paper.</p> <p>16 BY MR. LAKE:</p> <p>17 Q. Thank you very much. That was all I wanted</p> <p>18 to ask you about.</p> <p>19 A. Okay.</p> <p>20 Q. And I don't have any technical questions.</p> <p>21 A. Okay.</p> <p>22 MR. RUGGERO SANTILLI: They call Mr. -- they</p> <p>23 called me Doctor. In the other they called me</p> <p>24 Mister, and in the other they called me Doctor.</p> <p>25 THE WITNESS: Well, I don't -- I don't</p>

<p>Page 22</p> <p>1 understand that.</p> <p>2 BY MR. LAKE:</p> <p>3 Q. We just met today, so I may ask you some</p> <p>4 things that you weren't involved in.</p> <p>5 A. Of course.</p> <p>6 Q. But I'm just trying to find out --</p> <p>7 A. Of course. Yeah, no problems.</p> <p>8 Q. Are you involved at the website</p> <p>9 scientificethics.org?</p> <p>10 A. Not at all.</p> <p>11 Q. Okay. You haven't written articles that</p> <p>12 appeared on that website?</p> <p>13 A. Not at all.</p> <p>14 Q. All right. As a president and CEO of</p> <p>15 Hadronic Press, you're familiar with other scientific</p> <p>16 publishers, correct?</p> <p>17 A. Yes, to a certain extent.</p> <p>18 Q. To a certain extent?</p> <p>19 A. Many publishers like us, the small</p> <p>20 publishers, they're all being absorbed by bigger</p> <p>21 publishers now. All the publishers are all big, and I</p> <p>22 don't have knowledge of the big business, because it</p> <p>23 involves publishing and it involves many other things.</p> <p>24 So I'm familiar with the -- with some aspects of</p> <p>25 publishing.</p>	<p>Page 24</p> <p>1 Hadronic Mathematics in the American Journal of Modern</p> <p>2 Physics.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Are you familiar with that particular issue?</p> <p>6 A. Not that I recall right now --</p> <p>7 Q. Okay.</p> <p>8 A. -- because there were several.</p> <p>9 Q. Okay. Let me just ask you, if you know, the</p> <p>10 names of some of the authors. The first one is Richard</p> <p>11 Anderson.</p> <p>12 A. No, I don't.</p> <p>13 Q. You don't know him.</p> <p>14 I see he's also listed as the lead guest</p> <p>15 editor. Does that help identify him?</p> <p>16 A. No.</p> <p>17 Q. Okay.</p> <p>18 A. I'm not familiar with that particular name.</p> <p>19 Q. Okay. The second article is by, it appears,</p> <p>20 Chun Xuan-Jiang.</p> <p>21 A. Yes.</p> <p>22 Q. Do you know who that is?</p> <p>23 A. No, I don't.</p> <p>24 Q. Okay. How about the third one, Svetlin</p> <p>25 Georgiev?</p>
<p>Page 23</p> <p>1 Q. Are you familiar with the Science Publishing</p> <p>2 Group?</p> <p>3 A. Yes, I do.</p> <p>4 Q. Okay. And so you know that one of those</p> <p>5 Science Publishing Group titles is The American Journal</p> <p>6 of Modern Physics, right?</p> <p>7 A. Yes, I do.</p> <p>8 Q. Okay. And that journal has published</p> <p>9 articles commenting on Dr. Santilli's research,</p> <p>10 correct?</p> <p>11 A. Yes, I do. I don't know the articles, but I</p> <p>12 know about it.</p> <p>13 Q. Sure. Okay.</p> <p>14 A. Mainly through Pepijn van Erp's description.</p> <p>15 (Exhibit V55 was marked for identification.)</p> <p>16 BY MR. LAKE:</p> <p>17 Q. Okay. I will show you a document we've</p> <p>18 marked V55. And I will tell you what this is, to give</p> <p>19 you some reference. I went to the Science Publishing</p> <p>20 website --</p> <p>21 A. Yes.</p> <p>22 Q. -- and did a search for articles with</p> <p>23 Dr. Santilli's name in the title. And this -- these</p> <p>24 are works I found. And it appears there's an issue</p> <p>25 devoted, or at least focusing, on Foundations of</p>	<p>Page 25</p> <p>1 A. Svetlin Georgiev.</p> <p>2 Q. Georgiev.</p> <p>3 A. Yes, I know him very well.</p> <p>4 Q. Okay. Tell me what you know about him.</p> <p>5 A. He's a top mathematician that was at the</p> <p>6 Sofia University and then was at Sorbonne. And I know</p> <p>7 him because he attended some of the conferences that we</p> <p>8 organized. And I also know that -- I know him</p> <p>9 specially because he brought six books, Foundations of</p> <p>10 Iso-Differential Calculus. And he wrote six books.</p> <p>11 And the reason why I know more about it, also, because</p> <p>12 at some point Pepijn van Erp said that, evidently, we</p> <p>13 had paid for having him -- having him publish his</p> <p>14 books.</p> <p>15 These books are published by Nova Publishers,</p> <p>16 which is a publisher in the United -- in New York. And</p> <p>17 I have -- I knew it because they advertised the book.</p> <p>18 And before advertising it, he sent us the -- he</p> <p>19 informed us that this -- that Nova was publishing the</p> <p>20 book. And this is -- I would like this to be placed in</p> <p>21 some type of record.</p> <p>22 Q. Sure. We can mark that as an exhibit.</p> <p>23 (Exhibit V56 was marked for identification.)</p> <p>24 THE WITNESS: Yeah, we can do that. And I'm</p> <p>25 going to read -- I'm going to read some of the</p>

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1 story -- of the book description.

2 "Author, Svetlin Georgiev, faculty of
3 mathematics, department of differential equation,
4 Sofia University, Sofia, Bulgaria." This was --
5 he wrote it in his capacity as professor of Sofia,
6 as I said before. Book description --

7 MR. PARRISH: Carla, when you're reading, try
8 to read a little bit slower so that Aaron can type
9 everything down.

10 THE WITNESS: Oh, I'm sorry. I told you.

11 Okay. Book description. "The genius idea is
12 the Santilli generalization of the basic unit of
13 quantum mechanics into an integro-differential
14 operator. This depends on local variables, and it
15 is assumed to be the inverse of the isotopic
16 elements, open bracket, the Santillian iso-unit,
17 closed.

18 "It was believed for centuries that
19 differential calculus can be dependent of the
20 assumed basic unit, since the latter was
21 traditionally given by the Trivial No. 1.

22 "Santilli has disproved this belief by
23 showing that the differential calculus can be
24 dependent on the assumed unit by formulating the
25 iso-differential calculus with basic

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1 know. I think it's together this one. No, give them
2 both, because one is the book and one is the
3 advertisement.

4 MR. RUGGERO SANTILLI: The advertisement is
5 separate.

6 THE WITNESS: Yeah.

7 BY MR. LAKE:

8 Q. The page you were reading from is --

9 A. That one, yes.

10 Q. -- Nova Science Publishers on the heading?

11 A. Yes.

12 Q. Before you read, let me get this marked. I
13 don't want to not mark things correctly.

14 MR. RUGGERO SANTILLI: An official
15 advertisement by Nova.

16 BY MR. LAKE:

17 Q. Okay.

18 A. Yeah. It is --

19 Q. Okay.

20 A. -- release that they did with that.

21 Q. Okay.

22 A. And after --

23 Q. Just a moment. I just want to make sure we
24 got this right. Volume 56 is what Mrs. Santilli was
25 reading from.

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1 iso-differentials.

2 "In the book" -- "in this book," meaning this
3 book, the author, meaning Georgiev -- "the authors
4 introduced the main definition and properties of
5 iso-numbers, iso-functions, and iso-differentials.
6 The book is provided with examples and exercises,
7 making it suitable for an introductory one or two
8 semester and graduate course on some of the major
9 aspects of iso-differential calculus.

10 "Alternatively, it may be used for a graduate
11 level course and as a reference work. With
12 exercises at the end of each chapter and the
13 straightforward writing style, the book addresses
14 readers who have prior knowledge on this subject
15 but have a basic background in graduate
16 mathematics, such as theory of functions and
17 differential calculus."

18 So this I would like to have as this.

19 BY MR. LAKE:

20 Q. Okay.

21 A. This one also. And --

22 Q. I'm sorry, before you keep reading, can we go
23 ahead and mark that? I don't want to get out of order
24 here.

25 A. I think it's this. It's together. I don't

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1 And then you have a book in front of you and
2 you've given me --

3 A. Exactly.

4 Q. -- the cover page and the title page from
5 that book.

6 A. Exactly.

7 Q. And we'll mark that 57.

8 (Exhibit V57 was marked for identification.)

9 THE WITNESS: Exactly.

10 BY MR. LAKE:

11 Q. Okay. And because we're marking these --

12 A. And I'm looking -- I also need another
13 attachment to that where it says, "Announcement. We
14 pick up that the editor in chief is Svetlin Georgiev,
15 who has written a five-volume" -- there were six -- "on
16 the iso-mathematics of Santilli. I wonder how much
17 Santilli paid for that service."

18 Q. Okay. And that we will mark as Volume --

19 A. Yes, please.

20 Q. I'm sorry, V58.

21 (Exhibit V58 was marked for identification.)

22 THE WITNESS: Also, when I'm allowed, I will
23 continue about this book just briefly.

24 BY MR. LAKE:

25 Q. Please.

<p>Page 30</p> <p>1 A. Because this book contains several chapters, 2 this is Volume I, and there are several -- and one of 3 the chapters is particularly relevant to this whole 4 bugaboo about antimatter. Santilli isodual mathematics 5 for antimatter. 6 THE REPORTER: I'm sorry? 7 THE WITNESS: Santilli isodual mathematics 8 for antimatter. 9 MR. RUGGERO SANTILLI: Isodual. 10 THE WITNESS: Isodual. 11 MR. RUGGERO SANTILLI: One single word. 12 THE WITNESS: Do you want to see the word? 13 THE REPORTER: That's fine. 14 THE WITNESS: Okay. And there are several 15 other places where Santilli is nominated, 16 basically, the entire book, but I'm not an expert, 17 so I'm not going on more. 18 BY MR. LAKE: 19 Q. All right. Let me ask you to look back at 20 Exhibit 55 -- 21 A. Yeah. 22 Q. -- the list I gave you from the Science 23 Publishing Group website. 24 The author -- Item 4 we've already asked 25 about, so Item 5, the author is Thomas Vougiouklis. I</p>	<p>Page 32</p> <p>1 BY MR. LAKE: 2 Q. If you would turn to the page -- to the sixth 3 article listed, includes the names of two authors, Rual 4 Falcon, or Falcon, perhaps. 5 A. Yes. 6 Q. And Juan Nunez. Do you know either of those 7 authors? 8 A. Excuse me. Can you repeat? Is the one Raul 9 Falcon? 10 Q. Yes. 11 A. Oh, I'm so glad you brought this up, because 12 these two gentlemen, they wrote a book, and the title 13 of the book is in Spanish, La Isoteoria de Santilli. 14 And this book was published in 2001. 15 Q. Okay. 16 A. So they wrote this book, and then they 17 continued to publish and attend the conferences, which 18 are the basis of this whole theory and discussion we 19 have, so I -- I don't know the purpose, however. 20 Q. Have you met them? 21 A. Excuse me? No, I never -- I just said that I 22 never met them, but I know about him. 23 Q. Okay. We've already asked you about the 24 gentleman listed at No. 7. 25 A. Yes.</p>
<p>Page 31</p> <p>1 may not be pronouncing that right. 2 A. Where is that? 3 Q. At the very bottom of the page. 4 MR. RUGGERO SANTILLI: Vougiouklis. 5 THE WITNESS: Of course, Thomas Vougiouklis. 6 BY MR. LAKE: 7 Q. Do you know Mr. Vougiouklis? 8 A. Yes, very well. 9 MR. RUGGERO SANTILLI: Professor Vougiouklis. 10 THE WITNESS: Professor Vougiouklis is very 11 well -- is a leading mathematician in the city of 12 Xanthi at the University of Thrace in Greece. 13 BY MR. LAKE: 14 Q. Okay. Let's -- 15 A. And -- 16 Q. I'm sorry, go ahead. 17 A. And this I would like to -- I would like to 18 read the title, because it's relevant to this whole 19 thing. 20 "Hypermathematics, hv-structures, 21 hypernumbers, hypermatrices, and lie-Santilli 22 admissibility." 23 THE REPORTER: I'm sorry, Santilli? 24 THE WITNESS: Admissibility. 25 THE REPORTER: Admissibility. Gotcha.</p>	<p>Page 33</p> <p>1 Q. And -- although, actually, I see they both 2 have the same last name. Perhaps they're brothers or 3 coauthors. 4 A. Who? 5 Q. T. Vougiouklis and S. Vougiouklis? 6 A. Okay. One is the daughter. 7 Q. Oh, daughter. Okay. 8 A. One is the daughter, Susanna Vougiouklis -- 9 Q. Okay. 10 A. -- and the Thomas Vougiouklis. 11 Q. Okay. And then No. 8, of course, is 12 Dr. Santilli. 13 A. Yes. 14 Q. Number 9, Richard Anderson, we already talked 15 about that. 16 A. Yeah. 17 Q. Do you know who paid the article fees to get 18 these works published in the American Journal of Modern 19 Physics? 20 A. No, I really don't know. 21 MR. PARRISH: Object to the form. 22 BY MR. LAKE: 23 Q. Okay. 24 MR. RUGGERO SANTILLI: I can answer that 25 question.</p>

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1 THE WITNESS: Because, you know, you'll be
2 asked another time.

3 BY MR. LAKE:

4 Q. Okay.

5 A. This is yours or mine?

6 THE REPORTER: Mine.

7 THE WITNESS: Okay. Don't let me run off
8 with anything.

9 BY MR. LAKE:

10 Q. Let me ask you about one other American
11 Journal of Modern Physics article. We've marked this
12 as 59.

13 (Exhibit V59 was marked for identification.)

14 BY MR. LAKE:

15 Q. Just take a look, if you would, and see if
16 you recognize that.

17 A. I don't recognize the article, because I
18 cannot read all the articles. I recognize the authors.

19 Q. Sure.

20 Okay. Tell me what you know about the
21 authors. I see the first one --

22 A. Okay.

23 Q. -- is Beghella.

24 A. Simone Beghella Bartoli.

25 Q. Thank you.

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1 that specialized in cameras and in lenses, but I cannot
2 say more than that.

3 Q. Okay. And according to the footnotes, the
4 first author is associated with the Institute for Basic
5 Research, or was at the time article was published.

6 Does that seem right to you?

7 A. I really don't know.

8 Q. You don't know?

9 A. I really don't know. He's in Italy, so it's
10 possible that he had some association --

11 Q. Okay.

12 A. -- but I really don't know about them.

13 Q. Okay. And Alex Nas, the footnote says, is
14 affiliated with Thunder Energies.

15 A. Right. I just said so, yeah.

16 Q. Okay. That's what I -- I'm just trying to be
17 clear. Thank you.

18 Do you know who paid the fees to have this
19 work published in the American Journal of Modern
20 Physics?

21 A. No, I don't know. I'm not very involved in
22 this.

23 Q. Okay. Do you know if Thunder Energies paid
24 these authors to write this article?

25 A. No.

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1 A. He's an engineer specializing in the
2 trajectory of -- I might not say the right word, but
3 he's specializing in the trajectory of --

4 MR. RUGGERO SANTILLI: Asteroids.

5 THE WITNESS: Excuse me?

6 MR. RUGGERO SANTILLI: Asteroids.

7 THE WITNESS: Asteroids, and, also, has a
8 Ph.D. in physics and astrophysics. Prashant
9 Bhujbal --

10 MR. RUGGERO SANTILLI: Plus a master in
11 England.

12 THE WITNESS: Yeah. He's a master in
13 England.

14 MR. RUGGERO SANTILLI: In astrophysics.

15 THE WITNESS: He's a master?

16 MR. RUGGERO SANTILLI: Yes.

17 THE WITNESS: Oh, okay. I'm sorry. As I
18 said, I know about them, but I don't know
19 completely.

20 BY MR. LAKE:

21 Q. I understand.

22 A. And then Prashant Bhujbal, I know him. I
23 know about him, but I'm not sure if I ever met him.
24 Possibly, yes.

25 Alex Nas, he was an engineer a long time ago

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1 Q. No, it did not, or, no, you don't?

2 A. They did not.

3 Q. They did not.

4 A. Because I think Alex Nas was a consultant on
5 and off. But if he was paid exactly to write this, I
6 don't know.

7 Q. Okay.

8 A. And the same for Beghella Baroli, and the
9 same the Indian person, because in India -- in India
10 there is a very large group of mathematicians and
11 physicists who study Ruggero's theory and they wrote
12 articles among themselves or with Ruggero and with
13 other people, but I wouldn't know more than that.

14 Q. Okay. Thank you. That was -- those are the
15 only questions I had about that one.

16 Let me ask you, just generally, about the
17 Science Publishing Group. What is its reputation in
18 the publishing industry, if you know?

19 A. It's the reputation of a -- first of all, he
20 is specializing in open access journals.

21 Q. Okay.

22 A. Open access journals are journals that all
23 publishers, American Journal of Modern Physics,
24 American Mathematical Society, a place to be free
25 downloading or for -- obviously, always with some type

<p>Page 38</p> <p>1 of a log-in, etc., from the Internet. And the authors 2 are contributing in some way to the publication, either 3 publication charges or publications support. And many 4 times people who have -- people who have grants use the 5 money of the grants to pay for this.</p> <p>6 Q. Okay.</p> <p>7 A. And they're called open access journals. 8 (Exhibit V60 was marked for identification.)</p> <p>9 BY MR. LAKE:</p> <p>10 Q. Okay. Exhibit 60, V60, is a page from the 11 American Journal of Modern Physics's website on the 12 Science Publishing Group website.</p> <p>13 A. Article processing charges.</p> <p>14 Q. Yes.</p> <p>15 A. I don't -- I'm not familiar with this 16 particular website.</p> <p>17 Q. Okay.</p> <p>18 A. I mean, possibly they're just repeating what 19 I just said. Why -- editorial work, peer review. They 20 say why do we have to publish, because, you know, 21 libraries now have very small budgets, so the -- many 22 authors have to resort to -- to being in open access. 23 And probably that explains why. But I really don't 24 know more. Let me see what they have here.</p> <p>25 Q. Okay. Sure.</p>	<p>Page 40</p> <p>1 everybody. So I really cannot say whether it's 2 right or wrong.</p> <p>3 BY MR. LAKE:</p> <p>4 Q. Okay. Do you know if the American -- well -- 5 sorry. Not the American Journal of Modern Physics 6 specifically. I meant to ask you about Science 7 Publishing Group in general.</p> <p>8 A. Yeah.</p> <p>9 Q. Has Science Publishing Group been called a 10 scam?</p> <p>11 A. Everybody has called it a scam.</p> <p>12 MR. PARRISH: Object to the form of the 13 question.</p> <p>14 THE WITNESS: So the Science Publishing 15 Group has been -- the first time I heard about 16 being called a scam is through Pepijn van Erp, who 17 cited the Beall's list, saying that it was called 18 a scam, the journal was called a scam. And then I 19 was looking and looking, and I found that many 20 people do not agree with that list, professors and 21 so forth. And a publisher from Canada started the 22 lawsuit against Beall's to the point that in 23 January 15, 2017, Beall's list was taken down.</p> <p>24 So my opinion is that list is not valid. If 25 Beall calls it and then it disavows his own work,</p>
<p>Page 39</p> <p>1 A. How do the author pay? Who is responsible? 2 The corresponding author, we've been notified. I'm 3 really not familiar with this whole discussion.</p> <p>4 Q. Okay. But I think it is consistent with what 5 you've told me a second ago.</p> <p>6 A. Exactly.</p> <p>7 Q. And in this case, it appears that the article 8 processing charge for the American Journal of Modern 9 Physics was to be \$970 at this time.</p> <p>10 Does that seem right?</p> <p>11 A. I don't know. I don't know.</p> <p>12 Q. Okay.</p> <p>13 A. Because it depends if it's -- because, also, 14 there is -- there is all types of charges.</p> <p>15 MR. PARRISH: Object to the form of the 16 question.</p> <p>17 THE WITNESS: If he --</p> <p>18 MR. RUGGERO SANTILLI: Object to --</p> <p>19 THE WITNESS: Ruggero --</p> <p>20 MR. PARRISH: I've got it.</p> <p>21 THE WITNESS: If this is sent -- if this is 22 sent to -- if the payment is done by a grant, it's 23 probably \$900. If the paper is a small author who 24 lives in India, it's probably \$100. And 25 probably -- I mean, this is a common practice with</p>	<p>Page 41</p> <p>1 other people will call it a scam. It's just 2 jumping on whatever.</p> <p>3 BY MR. LAKE:</p> <p>4 Q. Okay. Let me show you some articles and see 5 what they appear to be to you.</p> <p>6 A. Yes.</p> <p>7 (Exhibit V61 was marked for identification.)</p> <p>8 BY MR. LAKE:</p> <p>9 Q. Volume 61 -- I'm sorry, V61, does that appear 10 to be an article entitled, Science Publishing Group, a 11 Complete Scam?</p> <p>12 MR. LAKE: Object to the form.</p> <p>13 THE WITNESS: Yes, it is. But this is an 14 Emerald City Journal. It's a probably a Seattle 15 newspaper by the people or the people. I don't 16 think it has a good reputation at all, this 17 journal. So to me it doesn't make any -- it 18 doesn't mean anything.</p> <p>19 BY MR. LAKE:</p> <p>20 Q. Okay.</p> <p>21 A. It was created for the people to express 22 their views and voices. It's a Seattle newspaper that 23 gives everyone a voice. The Emerald City Journal is an 24 opinion newspaper for everyone wanting to share their 25 voice with the world. I worry when I see these words</p>

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1 in publishing.

2 Q. Okay.

3 A. I really do.

4 (Exhibit V62 was marked for identification.)

5 BY MR. LAKE:

6 Q. Let me show you what we've marked as V62.

7 And does that appear to be an online article with the
8 headline, The Predatory Beat Goes On?

9 A. Yeah. In The Pipeline?

10 Q. Yes.

11 A. "Derek Lowe's comments on drug discovery and
12 the pharma industry. An editorially independent blog
13 from the publishers of Science Translational Medicine."

14 So how is this related to --

15 Q. Yeah. Let me ask you a question about it, if
16 you'll turn to the second page.

17 A. Yeah.

18 Q. There are comments on this article. And if
19 you would look at the one at the middle of the page,
20 it's dated -- it's Loup Garous. I may not be
21 pronouncing his name right.

22 A. Yeah.

23 Q. And it says that -- it refers to the Science
24 Publishing Group as an empire of bogus scientific
25 journals.

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1 Q. Let me show you V63, please.

2 A. Yes.

3 Q. And does that appear to be an article --

4 A. Oh, yeah. It's still the publishing group.

5 Okay.

6 Q. Yes. An article from a website called

7 ResearchGate. It's at researchgate.net.

8 A. Yeah.

9 Q. Do you see that?

10 And the first question posted or asked, Are
11 students being warned about Science Publishing Group?

12 Do you see that?

13 A. Yes, yes, I see that, but, I mean, this -- I
14 don't know. This is four years ago, and now it's 2017.

15 All this has no more value, because it was removed by
16 its own author. So, to me, I mean, we can go on about

17 Science Publishing and the Beall's list. And you'll
18 find tons of people, I mean --

19 Q. We will find tons of people what?

20 A. Criticizing, you know, in the blogs.

21 Q. Okay. Criticizing --

22 A. For me --

23 Q. -- Science Publishing Group? I just didn't
24 know what you meant.

25 A. Discussing.

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1 Do you see that?

2 A. Right, yeah.

3 Q. Okay.

4 A. But this is -- Loup Garous is who knows.
5 He's somebody in a blog. This has no value to me.

6 Plus, this was -- this whole game about this
7 date in which the list was taken down did not go well
8 with many of these people who were writing blogs, etc.,
9 etc.

10 So they start to revive it. But to me, if
11 the author doesn't want this -- said that this list is
12 no longer good to be on the Internet, people should not
13 cite it. And I have no value -- to me, this has
14 absolutely no value.

15 (Exhibit V63 was marked for identification.)

16 BY MR. LAKE:

17 Q. Okay. Let me show you --

18 A. Can I get some water, just a moment?

19 Q. Of course.

20 THE WITNESS: Let me just get my -- this is
21 my cup, Ruggero.

22 MR. RUGGERO SANTILLI: This is cold.

23 THE WITNESS: Thank you. Just a sip of
24 water.

25 BY MR. LAKE:

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1 Q. Discussing?

2 A. Some of them criticize and some of them are
3 in favor.

4 Q. Okay.

5 A. But, to me, because they're bloggers, they
6 have no value.

7 Q. Okay.

8 A. But, you know, apparently, somebody thinks
9 bloggers are important.

10 Q. But you've certainly never seen comments like
11 this about Hadronic Press, have you?

12 A. Absolutely not.

13 Q. So you would say Hadronic Press has a much
14 better reputation than Science Publishing Group?

15 A. Absolutely, absolutely.

16 MR. PARRISH: Object to the form of the last
17 question.

18 THE WITNESS: Unless somebody says, they only
19 publish this book by his -- by his husband, this
20 type of thing, which, you know, they're afraid to
21 say, but I can demonstrate it's absolutely wrong.

22 BY MR. LAKE:

23 Q. Okay.

24 MR. PARRISH: Aaron, are you picking me up on
25 this?

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1 THE REPORTER: Yes.
 2 MR. PARRISH: Okay. Thank you.
 3 THE WITNESS: And this is the Journal of Food
 4 Science and Nutrition. I mean, it's not the level
 5 of physics or mathematics.
 6 BY MR. LAKE:
 7 Q. You're a director of Thunder Energies,
 8 correct?
 9 A. Yes, I am.
 10 Q. I just want --
 11 A. And founder.
 12 Q. A founder. Good point.
 13 A. Yes.
 14 Q. I just want to ask you about some
 15 Thunder Energies articles --
 16 A. Okay.
 17 Q. -- and see if you recognize these.
 18 (Exhibit V64 was marked for identification.)
 19 BY MR. LAKE:
 20 Q. Let me show you V64. And once you've had a
 21 chance to look it over, I will ask you a question about
 22 it.
 23 A. Yes.
 24 Q. Does that appear to be a news release from
 25 Thunder Energies?

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1 A. Let me just see.
 2 Q. Sure.
 3 A. Yes, it is, but I don't know who the -- let
 4 me just see because, you know -- yes. In these press
 5 releases, I want to say that these are -- the two,
 6 they're the same.
 7 Q. Thank you. I was wondering where
 8 Mr. Parrish's copy was.
 9 A. Oh, okay.
 10 Q. I inadvertently gave you two.
 11 A. They're the same thing, yeah. These press
 12 releases --
 13 MR. PARRISH: Hold on. This is the original
 14 exhibit. It's got the original sticker on it.
 15 BY MR. LAKE:
 16 Q. Yeah. If you would keep the copy that
 17 Mr. Parrish is handing you, and give him the one that
 18 is in your right hand. Thank you very much.
 19 A. Press releases are reviewed by the specific
 20 companies that specializes in sending press releases
 21 for the public companies. We cannot just go anywhere
 22 and say, Ah, now we're going to do a press release.
 23 These press releases are certified or approved to be
 24 transmitted by them. So PM web is one of the releases.
 25 And I don't remember exactly if this is the NASDAQ,

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1 because many companies like NASDAQ or OTCCQ, they have
 2 their own press releases company, and I don't -- I'm
 3 not sure if this is NASDAQ.
 4 Q. Okay.
 5 A. So they watch very well what they're doing.
 6 Q. Okay. But as a general matter,
 7 Thunder Energies put out press releases like this
 8 announcing developments with its products, correct?
 9 A. Yes.
 10 Q. Okay.
 11 A. Yes. But this one for sure. The other one
 12 you're citing, I'm not sure.
 13 Q. Okay. Well, I'm going to give you another
 14 one, so you --
 15 A. Yeah.
 16 Q. -- can take a look at it. V65, please.
 17 (Exhibit V65 was marked for identification.)
 18 BY MR. LAKE:
 19 Q. Does that appear to be another --
 20 A. Yeah, this one as well.
 21 Q. Okay.
 22 A. Right.
 23 Q. Okay.
 24 A. Independent confirmed detection, yeah.
 25 Q. And do you know Pamela Fleming?

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1 A. I used -- she used to work for us and then
 2 she's gone. She was -- she is a -- was a person
 3 from -- she was here with her husband from Ireland.
 4 And she would work in different capacities in many
 5 times, and she would have with many classes. But, you
 6 know -- and then she went back. I think she went back
 7 to Ireland, but I'm not sure, definitely left -- went
 8 out of the state.
 9 Q. Okay.
 10 A. And I could not tell you exactly when --
 11 Q. Okay.
 12 A. -- this is. But I wasn't really involved at
 13 all because, you know --
 14 Q. Okay.
 15 A. -- I had a lot of things to -- you can put
 16 just that.
 17 Q. Thank you.
 18 (Exhibit V66 was marked for identification.)
 19 BY MR. LAKE:
 20 Q. Let me show you V66 and ask if this appears
 21 to be another news release from Thunder Energies.
 22 A. Discovers invisible entities, yes.
 23 Q. Okay.
 24 A. Thunder Energies recently detected invisible
 25 entities --

<p>Page 50</p> <p>1 THE REPORTER: I'm sorry?</p> <p>2 THE WITNESS: Vancouver.</p> <p>3 MR. RUGGERO SANTILLI: Carla, repeat.</p> <p>4 THE WITNESS: I'm sorry.</p> <p>5 MR. PARRISH: You're going too fast.</p> <p>6 THE WITNESS: I'm trying to understand</p> <p>7 Thunder Energies discovers entities.</p> <p>8 MR. RUGGERO SANTILLI: Read slowly.</p> <p>9 THE WITNESS: And these are PR Web by this</p> <p>10 company, Vancouver company. Yes, they did.</p> <p>11 BY MR. LAKE:</p> <p>12 Q. And you were about to read the -- I think</p> <p>13 it's the caption underneath the video frame.</p> <p>14 A. Yes.</p> <p>15 Q. "Thunder Energies Corp. has recently detected</p> <p>16 invisible entities" --</p> <p>17 A. Yes.</p> <p>18 Q. -- "in our terrestrial environment" --</p> <p>19 A. Yes.</p> <p>20 Q. -- "with the revolutionary Santilli</p> <p>21 telescope."</p> <p>22 A. Yes.</p> <p>23 Q. Do you see that?</p> <p>24 A. (Nods affirmatively.)</p> <p>25 Q. Were you involved in the observation of these</p>	<p>Page 52</p> <p>1 A. I know that this group, we had a lot of</p> <p>2 requests. You couldn't imagine with all these people</p> <p>3 going around. And this group asked to buy it, and</p> <p>4 they -- for everybody who tries to buy a telescope,</p> <p>5 it's always very clearly interviewed on how they're</p> <p>6 going to use it, how do they -- they need to be trained</p> <p>7 in using it. And that's all I remember -- or not that</p> <p>8 I remember, but that's all I know. There were three</p> <p>9 people that purchased it, and that's it. That's all I</p> <p>10 remember.</p> <p>11 Q. Okay.</p> <p>12 MR. PARRISH: And I'm going to object to the</p> <p>13 last question.</p> <p>14 MR. RUGGERO SANTILLI: Yeah. No technical</p> <p>15 question to my wife. You ask them to me.</p> <p>16 MR. LAKE: Okay. I don't think that was a</p> <p>17 technical question.</p> <p>18 MR. RUGGERO SANTILLI: Yes, it was.</p> <p>19 MR. LAKE: I asked her what she recalled.</p> <p>20 MR. RUGGERO SANTILLI: I disagree.</p> <p>21 THE WITNESS: Okay.</p> <p>22 BY MR. LAKE:</p> <p>23 Q. Now, in addition to the news releases we've</p> <p>24 talked about from Thunder Energies, other companies,</p> <p>25 other publisher websites reported on the invisible</p>
<p>Page 51</p> <p>1 invisible entities?</p> <p>2 A. We travel together, my husband and I, and</p> <p>3 sometimes we use the telescope together. And I'm not</p> <p>4 sure if this particular event I was there or not. But,</p> <p>5 you know, I see a lot of stuff.</p> <p>6 Q. Okay. But you've seen the images?</p> <p>7 A. Yes, I did. I did. And I saw them published</p> <p>8 as well, and I'm comfortable with that.</p> <p>9 Q. Okay.</p> <p>10 (Exhibit V67 was marked for identification.)</p> <p>11 BY MR. LAKE:</p> <p>12 Q. V67, please, if you would take a look at that</p> <p>13 and see if it appears to be another --</p> <p>14 A. Yes.</p> <p>15 Q. -- news release.</p> <p>16 A. "Thunder Energies announces the sale and</p> <p>17 delivery of two pairs of proprietary telescopes to a</p> <p>18 filmmaker group."</p> <p>19 THE REPORTER: I'm sorry. Thunder Energies</p> <p>20 announces the delivery?</p> <p>21 THE WITNESS: "Of two pairs of proprietary</p> <p>22 telescopes to a filmmaker group."</p> <p>23 BY MR. LAKE:</p> <p>24 Q. What do you recall, if anything, about the</p> <p>25 sale of telescopes to a film group?</p>	<p>Page 53</p> <p>1 terrestrial entities, correct?</p> <p>2 A. Yes. You saw it there in that list you gave</p> <p>3 me, yes.</p> <p>4 Q. And not just academic journals, but all kinds</p> <p>5 of organizations picked this up?</p> <p>6 A. Yes, yes.</p> <p>7 Q. Dr. Santilli, I think, was interviewed by</p> <p>8 websites regarding invisible terrestrial entities.</p> <p>9 A. I don't recall, but, possibly, there were a</p> <p>10 lot of interviews about it.</p> <p>11 (Exhibits V68 and V69 were marked for</p> <p>12 identification.)</p> <p>13 BY MR. LAKE:</p> <p>14 Q. Okay. Mrs. Santilli, I'm marking V68 and</p> <p>15 69 --</p> <p>16 A. Okay.</p> <p>17 Q. -- together, because I believe these are</p> <p>18 parts 1 and 2 of the same article --</p> <p>19 A. Okay.</p> <p>20 Q. -- if you would take a look.</p> <p>21 THE REPORTER: I'm sorry. If you're going to</p> <p>22 read something, I need you to speak up or --</p> <p>23 THE WITNESS: Ancient Origins. I don't know.</p> <p>24 I never saw this one. Ancient Origins,</p> <p>25 Reconstructing the Story of Humanity's Past, I</p>

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1 never saw this one. We never -- I never read it.
 2 BY MR. LAKE:
 3 Q. Okay.
 4 A. I never did anything --
 5 Q. The --
 6 A. -- with this.
 7 Q. If we just look at the photographs in the
 8 middle of the page --
 9 A. Yeah.
 10 Q. -- there's -- it looks like the skyline of
 11 Tampa, correct?
 12 A. Yeah. I'm not sure, but possibly.
 13 Q. Okay. A city skyline, then?
 14 A. Yeah.
 15 Q. And then --
 16 A. Yeah, yes.
 17 Q. And there's an image in the top left corner
 18 of that photograph.
 19 A. Yes.
 20 Q. Do you recognize that?
 21 A. I have seen it around. It's interesting they
 22 put it together, so that doesn't mean that they were
 23 somewhere else and they --
 24 Q. Oh, sure.
 25 A. -- pasted this. So I don't know. I really

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1 don't know.
 2 Q. Okay. But --
 3 A. But Ancient Origins --
 4 Q. Sorry.
 5 But the headline, "Breaking News: New
 6 Telescope Observes Otherwise Invisible Terrestrial
 7 Entities with Intelligent Movement."
 8 A. Yeah, of course.
 9 Q. Do you see that?
 10 A. Yeah.
 11 Q. Okay.
 12 A. New report published in the -- I mean, those
 13 are the -- I'm sure that these journals that -- Ancient
 14 Origins, they talk with aliens, and all this, they do
 15 their own thing. They drive the reader toward their
 16 own bias, their own interest. Definitely, they don't
 17 have any idea of the scientific, the mathematics, and
 18 the whole thing that is here.
 19 Q. Okay.
 20 A. So, to me, I don't give it a lot of value.
 21 And, of course, this is like very fertile terrain for a
 22 blogger.
 23 Q. Okay. The subject of invisible terrestrial
 24 entities is fertile terrain for a blogger. Is that
 25 what you said?

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1 A. These type of journals that --
 2 Q. These type of journals?
 3 A. -- that twist and copies and paste up and
 4 have this news, breaking news with intelligent
 5 movement. Whoever said intelligent movement? Nobody
 6 ever said that. You see, this is what I'm trying to
 7 say. The bloggers -- look at this. In search of Paul
 8 [inaudible] rising, weird tales, witchcraft. I mean,
 9 definitely I'm not associated with any of that.
 10 Q. Okay. The phrase "breaking news" is from the
 11 Thunder Energies announcement, though, isn't it?
 12 A. It's from everywhere. Everybody uses the
 13 word "breaking news."
 14 Q. Sure. And --
 15 A. So if they wrote "breaking news," it's fine.
 16 But it's what comes after that is not fine.
 17 (Exhibit V70 was marked for identification.)
 18 BY MR. LAKE:
 19 Q. Okay. Let me show you V70 --
 20 A. Okay.
 21 Q. -- which appears to be an internet article
 22 about an interview Dr. Santilli gave a website called,
 23 Freedom UFOs, hosted by Marc Gray.
 24 Do you see that?
 25 A. Let me just read it.

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1 Q. Sure.
 2 A. Kathy? Who is Kathy? Freedom -- oh, yes,
 3 Freedom Interview, right. I mean, these people that
 4 they -- Freedom Interview is very famous all over --
 5 it's a radio show that publishes all over the country.
 6 And now there is a new publisher that transmits all
 7 over the country. It used to be a famous radio host
 8 that is -- no longer does it. So he -- they took over
 9 this, and I'm not sure -- they -- it seems that here it
 10 was the advertisement. They pasted it from everywhere.
 11 I'm looking here. But, you know, this is like a
 12 very -- people are -- people are interested in this
 13 subject.
 14 Q. Absolutely.
 15 A. As a matter of fact, Science Friday, which is
 16 a PBS show, just transmitted how to talk with aliens.
 17 Q. Okay.
 18 A. So I would like have this put somewhere,
 19 because there are two professors here who participated
 20 with the talk. One was an associate professor of
 21 philosophy at the University of Clemson, in South
 22 Carolina, and another one at Bowling Green State
 23 University in Bowling Green. And Jack [inaudible] is a
 24 research scientist with the Blue Marble Space Institute
 25 of Science in Clayton, Delaware. So it's like a very

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1 common thing that people do. They write --
2 MR. RUGGERO SANTILLI: You have to request it
3 be on the record. Don't put it --

4 THE WITNESS: Yes, I have. Yeah, I asked it
5 to be part of the --

6 MR. RUGGERO SANTILLI: I didn't hear that.

7 THE WITNESS: Oh, okay. No, I think it needs
8 to be, because it's part of this whole culture of
9 looking for aliens, looking for out -- for
10 interstellar life. And I just want to recall that
11 recently there was -- there was the Sati -- I
12 don't know if somebody is familiar with Sati --
13 was the search for the intelligent --

14 BY MR. LAKE:

15 Q. Extraterrestrial intelligence?

16 A. Yeah, in the space. They cancelled it, and
17 now they started it again with the support of the
18 universities and science groups, so --

19 Q. Okay.

20 A. -- I'm not worried about -- I don't see that
21 as a detraction.

22 Q. Okay. I will mark this V71.

23 A. Yeah, of course, I would like it to be part
24 of that.

25 Q. Okay.

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1 just providing them as documentation of things out
2 there that are mentioning Ruggero Santilli?

3 THE WITNESS: Yeah.

4 MR. RUGGERO SANTILLI: He doesn't understand
5 it's damaging to himself by quoting things --

6 MR. PARRISH: I'm just wondering if I need to
7 go back and object to all these due to hearsay --

8 THE WITNESS: One by one.

9 MR. PARRISH: -- if I'm going to have to do
10 that. I'm just trying to figure out the purpose
11 of what's happening here at this moment.

12 MR. RUGGERO SANTILLI: It's very insidious
13 stuff.

14 MR. PARRISH: Are you -- are you proposing
15 these documents as the truth of the matter
16 asserted, or are you just proposing these
17 documents as things out on the Internet that are
18 cited to Dr. Santilli?

19 MR. LAKE: The latter.

20 MR. PARRISH: As long as that's the case,
21 then that's fine.

22 THE WITNESS: Yeah.

23 MR. PARRISH: He's --

24 THE WITNESS: Can you repeat that?

25 MR. RUGGERO SANTILLI: This is a waste of our

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1 (Exhibits V71 and V72 were marked for
2 identification.)

3 THE WITNESS: And that is PBS. PBS is quite
4 reputable.

5 BY MR. LAKE:

6 Q. Let me show you V72. And this appears to be
7 an article from a website called UFO Casebook Forum.

8 A. UFO Casebook Forum?

9 Q. Yes.

10 A. I have no idea. I mean, these people, they
11 write, I'm sure, and they see -- you see, this is
12 funny. They see like someone who is [inaudible], and
13 they write down. And it's like a little animal that is
14 the thought of this person. I mean, people are funny.
15 There is another one that is a swamp rat.

16 THE REPORTER: That's what?

17 THE WITNESS: A swamp rat. There's another
18 one that says, Someone is messing with force.
19 Another one, mixed memories of -- so I don't know.
20 I mean, whatever they say doesn't mean anything to
21 me. It's just one more, you know, lead with no
22 value at all.

23 MR. PARRISH: Just real quickly for the
24 record, are we -- are you proposing these articles
25 as the truth of the matter asserted, or are you

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1 time.

2 THE WITNESS: Yeah. But anyway, I'm glad,
3 because some of these things I didn't even know,
4 and I think it's ridiculous --

5 MR. PARRISH: Okay.

6 THE WITNESS: -- that I spend time --

7 MR. PARRISH: Let me explain. All he's doing
8 is providing these as citations to Dr. Santilli.
9 He's not saying that the articles are true. He's
10 not trying to propose that these articles are
11 scientific.

12 THE WITNESS: Yeah.

13 MR. PARRISH: He's just saying --

14 THE WITNESS: Yeah.

15 MR. PARRISH: -- that these are things that
16 are cited to --

17 THE WITNESS: In order to see if he can
18 damage the reputation of Santilli.

19 MR. RUGGERO SANTILLI: Well, that's the
20 intent. I want to talk --

21 (Multiple people speaking at once.)

22 THE WITNESS: I object to this.

23 MR. RUGGERO SANTILLI: I want to talk.

24 Otherwise, we leave. Since the origin is not --
25 is totally unqualified, this gentleman -- I'm a

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1 little bit --

2 THE WITNESS: Yeah.

3 MR. RUGGERO SANTILLI: -- dubious of the
4 word. But this individual will quote -- will
5 quote this against us --

6 THE WITNESS: Yeah, of course.

7 MR. RUGGERO SANTILLI: -- because that does
8 not appear to be -- that's what this is -- that's
9 what I fear, so I request that you object to this
10 type of quotation that we have no connection. My
11 wife have no connection.

12 THE WITNESS: Yeah.

13 MR. RUGGERO SANTILLI: I have no connection.

14 THE WITNESS: And those --

15 MR. PARRISH: You guys are talking at the
16 same time. You can't do that.

17 MR. RUGGERO SANTILLI: What's the scheme that
18 this gentleman has behind presenting -- the one,
19 it's okay, now that it's settled.

20 THE WITNESS: Yeah.

21 MR. RUGGERO SANTILLI: So we have to decide
22 whether to stay, Carla, or leave.

23 THE WITNESS: No, I want to add one thing.

24 MR. RUGGERO SANTILLI: And we'll go to the
25 judge, in the presence of the judge.

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1 MR. RUGGERO SANTILLI: All my books I have
2 been paid royalties, in all my -- I have been paid
3 royalties. I never paid for my books.

4 THE WITNESS: That's not what they're trying
5 to say. Everybody, every author buys from -- for
6 open access books.

7 MR. RUGGERO SANTILLI: Huge sums for the --
8 paid -- I was paid in royalties.

9 THE WITNESS: Yeah. So all this is -- I'm
10 surprised that you are --

11 MR. RUGGERO SANTILLI: Paid royalties.

12 THE WITNESS: -- representing this.

13 BY MR. LAKE:

14 Q. All right. Well, I'd like to get back to one
15 more question on this topic --

16 A. Yes, please.

17 Q. -- and then we will move on.

18 MR. RUGGERO SANTILLI: But we are --

19 MR. LAKE: Dr. Santilli, it's your wife's
20 deposition now. If you would, please keep your
21 comments to a minimum. Mr. Parrish has already
22 asked you to do that.

23 MR. RUGGERO SANTILLI: I have one final
24 statement, and then I will be silent. You are
25 borderline for -- very close to our decision to

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1 THE WITNESS: I want to add one thing, that,
2 in my opinion, all these things that are related
3 to bloggers, relate to this website that are
4 shady, you know, they have nothing to do with the
5 fact that my husband has been called stupid. And
6 then under his name for the last four years that
7 it was the sentence, "The Continuous Stupidity of
8 Ruggero Santilli." And this is --

9 MR. RUGGERO SANTILLI: In the url, Carla. In
10 the url.

11 THE WITNESS: If this is not -- if this is
12 not to prove that, I highly object, because, first
13 of all, my husband is not stupid. Otherwise, he
14 would not have wrote these books. So you
15 cannot -- Pepijn van Erp -- they cannot say
16 that -- Pepijn van Erp and Frank Israel cannot say
17 that they're exercising the freedom of speech by
18 saying he's stupid, because that is not stupid.

19 They said that we cannot -- he is a shady
20 author because he pays for the books and for the
21 publication. That doesn't apply either, because
22 everybody pays in some way or another the
23 publication, and he said that he would -- that the
24 book of -- that we paid for this book too. So,
25 you know, this is like -- this to me is --

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1 leave and go in front of the judge.

2 MR. LAKE: Well --

3 MR. RUGGERO SANTILLI: Very, very borderline.

4 MR. PARRISH: -- I think you should discuss
5 that with Mr. Parrish. That is your decision.

6 MR. RUGGERO SANTILLI: Our decision.

7 MR. LAKE: Yes.

8 MR. RUGGERO SANTILLI: Not Mr. Parrish's, our
9 decision.

10 MR. LAKE: Well, that's fine.

11 MR. RUGGERO SANTILLI: We are very anxious to
12 go in front of the judge.

13 MR. LAKE: Okay.

14 MR. RUGGERO SANTILLI: So if your questions
15 are clean, you will be respected. If your
16 questions are not clean and you expect respect
17 from us, think again. Think it over.

18 MR. LAKE: Okay.

19 MR. RUGGERO SANTILLI: All these questions
20 are extremely serious.

21 MR. LAKE: Mr. Parrish, could we -- would you
22 mind asking Dr. Santilli to keep his comments to a
23 minimum while taking the deposition of another
24 witness?

25 MR. PARRISH: Again, Dr. Santilli, what's

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1 happening is if -- you can discredit your wife's
2 testimony by telling her things while she's
3 testifying. So it's better for the record, it's
4 better for everything if you allow her to answer
5 the questions and then allow me to object. And,
6 also, if we need to bring those issues up before
7 the judge later, we can do that through the
8 objections.

9 MR. RUGGERO SANTILLI: The latest series of
10 questions are questions that this gentleman has --

11 MR. PARRISH: Right.

12 MR. RUGGERO SANTILLI: -- are very
13 objectionable.

14 MR. PARRISH: I understand.

15 MR. RUGGERO SANTILLI: They're not clean.

16 MR. PARRISH: I understand. And I have
17 objected to anything that would be at issue there.
18 So trust me, I'm objecting.

19 MR. RUGGERO SANTILLI: I don't feel well.

20 MR. PARRISH: I know.

21 MR. RUGGERO SANTILLI: If I feel bad, I will
22 rely on this gentleman to pay the cost. I will be
23 outside for a moment, and then I will be back when
24 I feel --

25 THE WITNESS: Don't worry.

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1 MR. RUGGERO SANTILLI: It's okay.

2 MR. PARRISH: Okay.

3 MR. LAKE: Should we go off the record to
4 deal with that?

5 MR. PARRISH: Yeah.

6 THE VIDEOGRAPHER: It's 2:31 p.m. We are off
7 the record.

8 (A recess was taken.)

9 THE VIDEOGRAPHER: At 2:31, we are on the
10 record.

11 (Exhibit V73 was marked for identification.)

12 BY MR. LAKE:

13 Q. Okay. Mrs. Santilli --

14 A. Yes.

15 Q. -- I just have one other example on this
16 topic, and then we can move on.

17 A. Yes.

18 Q. I will ask if this article from the UFO
19 International Project appears to be about
20 Dr. Santilli's video concerning the invisible
21 terrestrial entities?

22 A. You see, I don't know UFO project -- that are
23 a lot of projects, and, for example, the truth
24 coming -- let me just see. I don't know. I see this,
25 but it doesn't mean anything, because this is

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1 informational project, all new.

2 THE REPORTER: I'm sorry?

3 THE WITNESS: I don't know what that means.

4 The huge UFO ties shadow passenger planes. I
5 mean, this is a blog of a blog of a blog of a
6 blogger, so, to me, it doesn't mean anything. And
7 I -- let me just see that. So it's part of this
8 whole string of things you just showed.

9 BY MR. LAKE:

10 Q. Okay. But you do see Mr. Gaines' photo
11 there --

12 A. Yeah. And so --

13 Q. -- and a reference to Dr. Santilli --

14 A. So what? Because it's composed.

15 Q. If you would let me finish my question.

16 A. I'm sorry.

17 Q. Okay.

18 A. I'm a momma. I told you. I never let people
19 talk too much.

20 Q. A photo of Dr. Gaines and then further down a
21 reference to Dr. Santilli, correct?

22 A. Yeah.

23 Q. Okay.

24 A. So what does it mean?

25 Q. That's the only other question I had.

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1 A. Yeah. There was no relevance for him to call
2 MagneGas a pyramid scheme, because there is something
3 written in a blog.

4 Q. Were you involved in gathering documents in
5 response to our subpoena to the Institute for Basic
6 Research?

7 A. Subpoena for the Basic Research? I don't
8 know. I don't remember, because I got -- I think it
9 has to do with corresponding with Shelley. And I
10 corresponded with Shelley on many, many subjects.

11 Q. Sure?

12 A. So if she uses that, I have no idea. But
13 definitely I did not sign for that.

14 Q. Okay. Well, let me -- we'll go ahead and
15 mark this as an exhibit. And let me ask you, looking
16 at it, if it refreshes your recollection. And if not,
17 we will just move on.

18 (Exhibit V74 was marked for identification.)

19 BY MR. LAKE:

20 Q. The first page is the return of service, and
21 then it's followed by the actual subpoena. And see if
22 you recognize this subpoena.

23 A. AmeriLawyer -- yes, because these
24 people are -- these people, AmeriLawyer, are the
25 registered agent for -- for also -- for Hadronic Press.

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1 Q. Okay.
 2 A. But they are not for Thunder Energies.
 3 Q. Okay.
 4 A. So I don't know what that is.
 5 Q. Okay. If you will look at page 3.
 6 A. Yes.
 7 Q. It's actually --
 8 A. Yes.
 9 Q. -- the last page. And there's a list of
 10 documents there. And, again, I'm just trying to find
 11 out whether you personally were involved in this. You
 12 may not have been.
 13 Do you recall working on gathering documents
 14 in response to this subpoena?
 15 A. No, I really don't recall.
 16 Q. Okay.
 17 A. As I said, I have being working very hard
 18 with -- to provide documents of all those 20, probably,
 19 gathering requests that you have made, so I don't
 20 recall if I was part of this as well.
 21 So let me see. Correspondence from
 22 Pepijn van Erp, documentation of Pepijn van Erp. No, I
 23 don't recall. To tell you the truth, I don't recall.
 24 Q. Okay. Let me ask you. The subpoena was
 25 sent, and we did receive a response letter from

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1 Mr. Parrish's law firm. I'm just trying to figure out
 2 who the person was at Institute for Basic Research who
 3 searched for documents, whether it was you or
 4 Dr. Santilli.
 5 A. Probably both.
 6 Q. Okay.
 7 A. But I don't remember exactly if I looked. As
 8 I said, many of the documents -- I don't know. As I
 9 said, I worked with Shelley on many, many -- gathering
 10 many, many documents.
 11 Q. Okay.
 12 (Exhibit V75 was marked for identification.)
 13 BY MR. LAKE:
 14 Q. I will show you the letter that I received
 15 from Mr. Parrish's firm about the subpoena. And you'll
 16 see that in the first paragraph Mr. Parrish says that
 17 Professor Santilli, the owner, has informed us, after a
 18 diligent search, of the following response. And then
 19 the next paragraph, "There are no responsive documents
 20 that they know of."
 21 And since the letter used the word "they," I
 22 was wondering if you were among the people involved in
 23 the search.
 24 A. No responsive documents. I think
 25 it's they -- when you talk about the company and you

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1 don't know how many people are involved, you say
 2 "they," but I don't know what "they" is.
 3 Q. Okay.
 4 A. I mean, you have to ask --
 5 Q. That's fine. If you weren't involved, that's
 6 fine.
 7 A. You probably have to ask Mr. Parrish what you
 8 meant when he said "they."
 9 MR. LAKE: Okay. Joe, I think you've been
 10 volunteered to be deposed.
 11 THE WITNESS: Yes, of course. I mean, it's
 12 his signature, right? He wrote it, so maybe if
 13 somebody, you know --
 14 BY MR. LAKE:
 15 Q. Okay. Let me ask you about one of the names
 16 here. J.V. Kadeisvili. Do you know who that is?
 17 A. No.
 18 Q. So you never met anyone named
 19 J.V. Kadeisvili?
 20 A. No. That I recall, no.
 21 Q. Have you ever heard that name before?
 22 A. Yes, of course.
 23 Q. Okay.
 24 A. Especially after -- after Pepijn van Erp
 25 started to say that he did not exist, so I heard very

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1 well. But I don't know. You see, starting from the --
 2 from the '90s, Ruggero and I, we travel to Russia many
 3 times. We went to Moscow, to Dubna. And there were a
 4 lot of people there, and they spoke Russian, so I
 5 cannot say.
 6 Q. Okay. Are you aware of Hadronic Press, your
 7 company, publishing any books by J.V. Kadeisvili?
 8 A. Yes, it did in the past.
 9 Q. Okay.
 10 A. And -- but I never really met him. And
 11 Ruggero is the editor, so he's the one -- he probably
 12 read and made some corrections, or something, but I
 13 wasn't involved --
 14 Q. Okay.
 15 A. -- actually with the author themselves. And
 16 I think it's that -- the year was probably the Russian
 17 time. It was a long time ago.
 18 (Exhibit V76 was marked for identification.)
 19 BY MR. LAKE:
 20 Q. Okay. Mrs. Santilli, I thought I had a copy
 21 of the cover of this book, which is why I paused for a
 22 moment. I'm going to show you the actual book and
 23 perhaps during a break we'll get a copy made.
 24 A. Yes.
 25 Q. But does this appear to be the book you're

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1 referring to?

2 A. Yes, yes. You see Academy of Sciences from
3 the Ukraine, Institute of Theoretical Physics. This
4 was a book published by them and distributed here by
5 Hadronic Press, but it was really -- I was nothing more
6 than actually correcting or reading. And we knew
7 J.V. Kadeisvili, that's all I can say. You see, we
8 talk about 1997. I was telling you --

9 Q. Okay.

10 A. -- that's the time when he went, and we went
11 to the Academy of Ukraine, where there was the
12 Professor [inaudible], who was involved in many of
13 these things, so I really don't know.

14 Q. Okay.

15 A. And then we had -- we had several other
16 people in Russia that were working on these books.
17 Santilli's Isotopies of Contemporary Algebras,
18 Geometries and Relativities. Wow, a long time ago.

19 Q. Okay.

20 A. Wow.

21 Q. Just a couple more questions about the back
22 cover. You see --

23 A. This is very good, yeah.

24 Q. You see there that Kadeisvili is identified
25 as a permanent associate member of the institute's

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1 Q. The address for Hadronic Press that's on
2 there, on the back cover --

3 A. Exactly, yes.

4 Q. -- 35246 U.S. Highway 19 North.

5 A. Yes.

6 Q. I think we talked about this with

7 Dr. Santilli.

8 A. Yes.

9 Q. But I just want to make sure I got it right.
10 That's a mailbox location?

11 A. Yes. It's actually not just a mailbox. It's
12 a UPS center --

13 Q. All right.

14 A. -- where they do a variety of things. And,
15 in fact, you see No. 115. They have about ten boxes,
16 some more, and ten bigger. And if we need to ship
17 something, we go there. If they -- the advantage of
18 that and the reason we use it is that we travel a lot,
19 so if there are documents, they hold it for us. And
20 they -- when we arrive, we keep it -- we go there and
21 they -- and we take it from them. And it's very safe
22 and very legal.

23 Q. Thank you.

24 MR. LAKE: I will tell you what, so we do
25 this in order, Joe, let me propose that we set

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1 division of mathematics? Do you see that?

2 A. Yes.

3 Q. Do you know if that was a paid position?

4 A. They never -- no. It was never -- nobody is
5 ever paid, because it's a nonprofit organization that
6 doesn't -- that really has no -- no profit, nothing.
7 It's just -- it's a loose association of various
8 scientists and professors that worked on these
9 subjects.

10 Q. Okay. Would Hadronic Press have paid
11 royalties to Mr. -- or Professor Kadeisvili for this?

12 A. I'm not for sure, because we were dealing
13 with the Academy of Science of Ukraine, so they will
14 have to do something with him.

15 Q. Would you have paid royalties to the academy?

16 A. I really don't recall. It's possible. It's
17 possible that we sold the books and gave them a
18 percent. But, you know, 1997, a lot of time went by,
19 and I have been very busy doing other things.

20 Q. Sure.

21 So you wouldn't have any records about any
22 royalties?

23 A. No, no.

24 Q. Okay.

25 A. Wow, interesting that you find it. Wow.

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1 aside for the moment Exhibit 66 -- I'm sorry, 76,
2 V76.

3 MR. PARRISH: Yeah, that's fine.

4 MR. LAKE: And we'll copy the front and back
5 of this cover at a break, and then I will mark it.

6 BY MR. LAKE:

7 Q. Let me ask you, Mrs. Santilli, about your use
8 of the Internet. I know you've already given us some
9 testimony on this in the interrogatories.

10 A. Yes.

11 Q. You've told us you sometimes use a pen name
12 or an author name -- or rather --

13 A. I did? Did I say that?

14 Q. -- Dr. Santilli. I believe in your
15 interrogatory answers, yes.

16 A. Did I say that I use a pen name? Never.

17 Q. I think -- well, you used the Latin
18 "pseudonym."

19 A. What?

20 Q. Yeah. Let me --

21 A. No. Pseudonym -- I never use any pseudonym
22 at all.

23 Q. Okay. All right.

24 A. And that's all.

25 Q. Well, let's mark --

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1 A. I may have used some pseudonym somewhere when
2 I was responding to someone in some blogs, or something
3 like everybody else.

4 Q. Okay.

5 A. So I don't really --

6 Q. Well, I think we're saying --

7 A. That's all.

8 Q. -- the same thing.

9 A. But to tell you the truth, if you tell me
10 which were the number, name, I would not know --

11 Q. Okay.

12 A. -- because I'm really not eager.

13 Q. If you would look at your answer to our first
14 interrogatory to you.

15 A. Yeah. Plaintiff has been known by the
16 following names: Carla Santilli, yes. Carla
17 Gandiglio, yes. Carla Gandiglio Santilli and Carla G.
18 Santilli, yes. These are all names, because in Italy
19 we may use the maiden name only.

20 Q. Sure.

21 And then you went on to say you've also used
22 some pseudonyms in some blogs in attempts to contribute
23 to Wikipedia.

24 A. Where did I say that?

25 Q. It's at the bottom of the first page.

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1 (Exhibit V77 was marked for identification.)

2 THE WITNESS: A pen name is something very
3 different when you use an article using your
4 different name. I never did that.

5 BY MR. LAKE:

6 Q. Okay. So you have never commented on

7 Pepijn van Erp's articles?

8 A. Yes, I did.

9 Q. Okay.

10 A. And I told him so that I was -- that I was
11 Carla Santilli. I wrote him a few times. He replied
12 to me, and then I stopped because one time he said that
13 my husband was a liar, and that he was a coward, so I
14 didn't ask him -- I didn't write him anymore. And I
15 have those e-mails.

16 Q. Did you use a pseudonym when you were posting
17 on his blog?

18 A. Yes.

19 Q. Do you recall what that pseudonym was?

20 A. No, I don't recall.

21 Q. Okay.

22 A. I mean, maybe one or two times, and then,
23 frankly, I couldn't care less.

24 Q. Okay. Was it perhaps Frank Stone?

25 A. I don't recall. It's possible, but I don't

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1 MR. PARRISH: I object to the form of the --

2 THE WITNESS: Yes. You see, I just told you
3 that --

4 BY MR. LAKE:

5 Q. Okay.

6 A. -- it's possible.

7 Q. Yeah?

8 A. I didn't look at that.

9 Q. Sure. No, no, that's fine. If you would
10 read that paragraph into the record.

11 A. "I also have used pseudonyms in some blogs in
12 attempts to contribute to Wikipedia; however, I did not
13 keep a record, and I do not remember them. I do not
14 think it is illegal to use pseudonyms in blogs, as
15 everybody uses them."

16 Q. Okay.

17 A. That's all.

18 Q. Very good. Thank you.

19 MR. PARRISH: Did you attach that as an
20 exhibit? I'm sorry.

21 MR. LAKE: That's 76.

22 MR. PARRISH: That's V77.

23 MR. LAKE: I'm sorry, yeah. Thank you, yes.

24 I'm sorry. I'm going to take this number off and
25 maybe the interrogatory answer V77.

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1 recall.

2 Q. Okay.

3 A. As I said, it's not illegal, so --

4 Q. No.

5 A. -- I don't feel bad at all.

6 Q. I agree.

7 And it's very common for people to use pen
8 names.

9 A. Right. But, you know, I mean, I don't really
10 have time to do a lot of blog writing or blog reading.

11 (Exhibit V78 was marked for identification.)

12 BY MR. LAKE:

13 Q. Let me show you V78 and see if this appears
14 to be the comments you're referring to that you
15 submitted.

16 A. Yeah, sure, sure, yeah, it's possible,
17 because -- actually, hadron1@mac is my e-mail, so now
18 that you've told me, I remember. So that's it. I
19 never -- I always was very polite all the time, yeah.
20 Corda, da-da, yeah. Yes. So those are -- obviously,
21 it is out. It is me. Italian. So you want me to look
22 more? Yeah, let me just look more --

23 Q. Sure.

24 A. -- and make sure that it's not something that
25 I didn't do.

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1 Q. For the record, we've got three pages of
2 comments, and you're seeing the e-mail address
3 hadron1@mac.com, correct?
4 A. Yeah, right. That's it, yeah.
5 Q. I'm sorry, five pages.
6 A. Right, yeah.
7 And that's why, you know, he -- he was always
8 warned that what he was writing was wrong, that he was
9 calling it a Ponzi scheme, MagneGas Corporation, and so
10 forth. You see?
11 MR. PARRISH: I'm sorry, for the record --
12 THE WITNESS: And you see the point there?
13 MR. PARRISH: Carla, hold on just a second.
14 THE WITNESS: I'm sorry.
15 MR. PARRISH: Just for the record, you
16 mentioned that -- that the e-mail address was
17 hadron1@mac.com?
18 THE WITNESS: Correct.
19 MR. PARRISH: But then there is also one
20 that's hsdron1@mac.com.
21 MR. LAKE: Oh, good catch.
22 THE WITNESS: Where is that? No, I don't
23 have anything else. That's the only name --
24 number that I -- let me see. Where is the one
25 that you just mentioned?

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1 MR. PARRISH: "HS" --
2 THE WITNESS: Oh, it's just a mistake.
3 MR. PARRISH: -- and "HS."
4 THE WITNESS: No. It's just the "S" instead
5 of the "A."
6 BY MR. LAKE:
7 Q. But hadron1@mac.com is your e-mail --
8 A. Yes, it's mine.
9 Q. -- address and this other e-mail address --
10 A. I wrote it everywhere.
11 Q. Okay.
12 A. It was mine, right. I mean, I started out
13 when I see "The Continuous Stupidity of
14 Ruggero Santilli," and then, obviously, I had to write
15 a reply.
16 Q. Sure.
17 Did you ever use the name Luca Petronio when
18 commenting?
19 A. No.
20 Q. Okay.
21 A. Absolutely not. I don't know what that is.
22 Q. Okay. In fact, when we asked Mr. Parrish,
23 his office, for the opportunity to depose Luca
24 Petronio, Shelley, his assistant, wrote us back and
25 said you don't know of any such person, right?

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1 A. Exactly. No, I don't know. That's -- yeah.
2 Q. Right. Okay.
3 A. There was a time where we had a lot of people
4 in our offices in MagneGas. We had 65 employees, so
5 who knows what was going on in that sense, you know.
6 People were very upset about the fact that these blogs,
7 they were ruining their shares and the reputation of
8 the company, so --
9 Q. Let me show you on the comments that were
10 submitted -- again, we're looking at V78. Underneath
11 the -- your e-mail address is what I have learned is
12 called an IP address. It's the number 70.127.160.179.
13 Do you see that?
14 A. Where is that? Yeah.
15 Q. Sure. Where you see your e-mail address, do
16 you see those numbers?
17 A. You see on top, but I don't know my IP
18 because --
19 Q. No, that's fine. I'm just asking if you see
20 that number there.
21 A. I'm confused --
22 Q. Sure.
23 A. -- about the question.
24 Q. I'm just asking as you look at that piece of
25 paper --

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1 A. Yeah.
2 Q. -- you see on it, under your e-mail address,
3 70.127.160.179?
4 A. Yeah.
5 (Exhibit V79 was marked for identification.)
6 BY MR. LAKE:
7 Q. Okay. And let me show you an exhibit that
8 we've just marked V79 and ask if you see that same IP
9 address?
10 A. Listen, I see it, but definitely it's not me.
11 You see, I mean, this is -- how can you tell me that
12 this is 100 percent all from the -- is true? I don't
13 know. I never saw this e-mail. I never saw any of
14 this. I'm only using my -- my -- what is the IP
15 address?
16 Q. I'm not allowed to answer questions.
17 A. Okay. No. I think that the -- yeah, I see
18 that. But you see, my understanding is that the IP
19 address relates to a large area. So you could be here
20 and you are having to type the address, and two -- two
21 offices down the road, there could be the same IP
22 address.
23 Q. Okay.
24 A. So there's no meaning. Maybe I wrote this
25 while I was in MagneGas, and there were people all over

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1 having the same IP. But it's not my -- definitely the
2 IP is not my computer.

3 Q. Okay.

4 A. It's like a general area, as far as I know.
5 I'm not an expert.

6 Q. I understand.

7 So as you look at these on V79, these two
8 posts, you did not write these posts?

9 A. Excuse me?

10 Q. What I understand you to be saying is you did
11 not write the posts --

12 A. Absolutely not.

13 Q. -- on V79?

14 THE REPORTER: I just need you to let him
15 finish his question before you answer.

16 THE WITNESS: Say it again.

17 BY MR. LAKE:

18 Q. I understand that you didn't -- you're saying
19 you did not write these posts that are on --

20 A. These two?

21 Q. -- V79? Correct.

22 You just need to answer out loud for the
23 court reporter.

24 A. No.

25 Q. Okay.

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1 MR. LAKE: Why don't we take a break for a
2 moment, if that's all right with you.

3 THE WITNESS: I really don't need it, but if
4 you do.

5 MR. LAKE: I need to get some water, if
6 that's all right.

7 THE WITNESS: Okay. Go ahead. Yeah, that's
8 fine. Get you some water.

9 THE VIDEOGRAPHER: It's 2:55 p.m. We are off
10 the record.

11 (A recess was taken.)

12 THE VIDEOGRAPHER: At 3:02 p.m. we are on the
13 record.

14 BY MR. LAKE:

15 Q. Mrs. Santilli, let me ask you a little bit
16 about the damages that are being sought in the --

17 A. Excuse me, the damages?

18 Q. Yes. The damages --

19 A. Yes.

20 Q. -- that are being sought in this case.

21 A. Yes.

22 Q. I understand that the damages that are being
23 sought relate to the diminution in value or decline in
24 value of the stock of MagneGas and Thunder Energies; is
25 that correct?

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1 A. Absolutely not. They were probably written
2 by someone in our general area in the office, but --

3 Q. Just looking at them, can you -- do you have
4 any ideas as to who might have written them?

5 A. Say it again.

6 Q. If you could, look at them. Do you have any
7 idea who might have written them?

8 MR. PARRISH: Object to the form of the
9 question.

10 THE WITNESS: No, I don't.

11 BY MR. LAKE:

12 Q. Okay.

13 A. As I said, there were a lot of people very
14 upset about what was going on, so I don't know.
15 Absolutely not. I mean, I wouldn't write something
16 like this, and I don't know anybody that would write
17 like this --

18 Q. Okay.

19 A. -- that I know.

20 Again, I don't think this is related to the
21 fact that my husband is called stupid and the company
22 is called a pyramid scheme. I mean, I understand that
23 you want to have it. But, again, it's another attempt
24 to discredit us or to discredit our office, so I'm not
25 happy.

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1 A. Yes.

2 Q. Okay. And so it's your view that
3 Mr. van Erp's articles hurt the value of those
4 companies, correct?

5 A. Yes, yes.

6 (Exhibit V80 was marked for identification.)

7 BY MR. LAKE:

8 Q. Okay. I will show you a letter we've marked
9 as V80. And if would take a look at that. When you've
10 had a chance it look it over, I'll ask you a couple
11 questions.

12 A. I don't understand. I'm not sure -- I'm not
13 sure I understand that.

14 Q. Okay.

15 A. Let me just read it.

16 Q. Please.

17 A. What are these Interrogatories 2, 3, and 4?

18 THE COURT REPORTER: I'm sorry?

19 THE WITNESS: What are the Interrogatories 2,
20 3, 4? I don't recall. I have many
21 Interrogatories 2, 3, and 4.

22 BY MR. LAKE:

23 Q. Okay. My questions are not going to relate
24 to the first paragraph. I think the first paragraph is
25 pertaining to some -- an enclosure that came with the

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1 letter. I want to ask you --

2 A. Yeah. It talks about 16 and 17. I have no
3 idea. Maybe --

4 Q. Okay.

5 A. "We will not withdraw our objection as at no
6 time has the plaintiffs claimed any lost wages." Oh,
7 okay. I think I understand that.

8 Q. Okay.

9 A. The Schedule D -- yeah. So what is the
10 question you have about this?

11 Q. My question is about the last sentence, which
12 says, "Our clients have instructed us not to withdraw
13 our objections as personal tax returns, financial
14 statements, etc., of Dr. Santilli, as the
15 plaintiffs" --

16 A. Absolutely.

17 Q. -- "believe they are irrelevant."

18 A. They are absolutely irrelevant.

19 Q. So your personal loss of income is not
20 relevant to this case?

21 A. No, no. See, you're just moving things
22 around. The truth is that we were asked -- now I
23 recall. Were asked to report -- we were asked to give
24 the tax returns from seven years back. And the point I
25 made -- we made after we consulted our CPA, that there

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1 Q. Your contention in this case is not that some
2 business had a contract with Carla Santilli personally
3 and cancelled it because of a Pepijn van Erp article,
4 is it?

5 A. How can I say that? I didn't say that. I
6 said that the stock lost value because the -- it's all
7 the atmosphere of calling the company a pyramid scheme,
8 of saying that we were a fraudulent family, that my
9 husband was stupid, that he was impersonating things,
10 created in an atmosphere by which the stockbrokers and
11 the investment brokers had a hard time to go out and
12 propose this.

13 And I have a list of episodes, personally,
14 where it shows how much impact this whole thing had on
15 our reputation, because the reputation of the CEO, the
16 value of the company is based also on the reputation of
17 the CEO. You can see it. I mean, I'm saying a
18 different thing from you, so we're not saying the same
19 thing. We're saying two different things.

20 Q. Okay. Let me try again, because I really do
21 think we're saying the same thing.

22 A. Well --

23 Q. You're saying that you were injured because
24 these articles caused a decline of the value in the
25 stock of MagneGas and Thunder Energies, correct?

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1 is no way that you can find out from the tax return
2 that our holdings of MagneGas Corporation and Thunder
3 Energies stock was devalued, because the Schedule D
4 only -- because we are founding -- we are founding
5 people, our stock is given us value zero, comma, 001.

6 Therefore, only when we sell the stock, we
7 know that a certain amount was made. But there is no
8 way from the tax return to find out before, so it's
9 totally irrelevant. We did -- we had great losses of
10 the value of the stock as was reported by Scott
11 Tadsen the other day, who was the broker, and he
12 explained that. And this is related to that.

13 So I still contend that when you call the CEO
14 of the company stupid and you call the company a
15 pyramid scheme and the shorter -- I wrote this to
16 Mr. Pepijn. He was part of all of this shorter thing.
17 The shorter get the value of the stock down. And we,
18 as founder, has to sell the stock. The stock instead
19 of being sold to one is sold to half of that. So --
20 but that is never reported in our tax return. We were
21 advised by our accountants, CPA, and so the attorney
22 just reported what we were saying.

23 Q. I understand. I think we're saying the same
24 thing.

25 A. Yeah.

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1 A. And, therefore, our own stock.

2 MR. PARRISH: Objection.

3 BY MR. LAKE:

4 Q. I understand.

5 MR. PARRISH: Object to the form of the last
6 question.

7 THE WITNESS: I'm not -- I'm not concerned
8 about the stock of MagneGas, of the other
9 stockholders, because I'm not --

10 BY MR. LAKE:

11 Q. Sure.

12 A. -- I'm not suing them for that. It's my own
13 stock, my personal stock, my husband's stock --

14 Q. Stock that you --

15 A. -- my stock.

16 Q. I understand. The stock that you own and
17 that Dr. Santilli owns --

18 A. Exactly.

19 Q. -- in those companies, correct?

20 You are not saying that any particular person
21 declined to do business with Carla Santilli
22 individually because of Pepijn van Erp's blog?

23 A. It's impossible to find out. As my son told
24 me many times, he said -- I asked him.

25 I said, Can you tell me which contract you

<p>Page 94</p> <p>1 would not get?</p> <p>2 He said, You don't know, because people just</p> <p>3 disappear. They just -- they just look and see The</p> <p>4 Stupidity of Santilli and they say, Oh, is this the</p> <p>5 CEO? I don't want to go further in my -- in my</p> <p>6 investigation of the company, because if I go back to</p> <p>7 my investor they says, Are you crazy? Are you</p> <p>8 proposing a company that the CEO is called stupid? So</p> <p>9 that's the whole thing.</p> <p>10 Q. That's all I have on that subject.</p> <p>11 A. Yeah, yeah. That's very fair.</p> <p>12 MR. PARRISH: Object to the form of the last</p> <p>13 question.</p> <p>14 BY MR. LAKE:</p> <p>15 Q. Now, there have been other events that caused</p> <p>16 declines in the stock of MagneGas in the last few</p> <p>17 years, correct?</p> <p>18 A. Absolutely. Many of them.</p> <p>19 Q. Right.</p> <p>20 One being a fatal accident, right?</p> <p>21 A. Right. And I'm really surprised that you are</p> <p>22 pointing that out, because there was very little stock</p> <p>23 change in that as proven by all our stockholders,</p> <p>24 because the accident is an industrial accident. Many</p> <p>25 accidents happens, and so -- somehow we lost someone in</p>	<p>Page 96</p> <p>1 example of what happened, because then -- because</p> <p>2 they -- you know, these are the shorters. In fact, the</p> <p>3 shorters were -- they were reported to the SEC</p> <p>4 commission because it's illegal to short the stock.</p> <p>5 (Cell phone ringing.)</p> <p>6 MR. RUGGERO SANTILLI: I apologize. I</p> <p>7 apologize.</p> <p>8 THE VIDEOGRAPHER: At 3:11 p.m. we are off</p> <p>9 the record.</p> <p>10 (A recess was taken.)</p> <p>11 THE VIDEOGRAPHER: At 3:15 p.m. we are on the</p> <p>12 record.</p> <p>13 BY MR. LAKE:</p> <p>14 Q. Okay. Mrs. Santilli, I thought you might</p> <p>15 have wanted to say something when we came back on</p> <p>16 record.</p> <p>17 A. Yes. I just want to add something about the</p> <p>18 Pump Stopper.</p> <p>19 Q. Okay.</p> <p>20 A. The company eventually hired an attorney, and</p> <p>21 they put it down. However, Mr. Pepijn made a mirror</p> <p>22 copy, and he still has it on the website of MagneGas --</p> <p>23 of his blog, the same way he has an expired Beall's</p> <p>24 list. So he keeps -- still keeps all the stuff, even</p> <p>25 if it's not current anymore.</p>
<p>Page 95</p> <p>1 our family, basically, because it was one of our</p> <p>2 workers. Thunder Energies was not involved at all.</p> <p>3 MagneGas was involved. And if -- and we were</p> <p>4 totally -- how do you say? Nobody found any flaw with</p> <p>5 us. We would all be in jail. So -- but that was</p> <p>6 like -- maybe one week with small changes. It's</p> <p>7 ongoing presence of something like that that ruins a</p> <p>8 stock and ruins the reputation of the person, not one</p> <p>9 event that, as tragic as it is, you know, it doesn't</p> <p>10 create really -- in fact -- in fact, we have -- the</p> <p>11 MagneGas Corporation was accepting MagneGas fuel, was</p> <p>12 accepted as one of the safest fuel by the New York Fire</p> <p>13 Department. They did not remove their support. They</p> <p>14 continue to use it and have it [inaudible] fire</p> <p>15 department, the [inaudible]. So it did not affect any</p> <p>16 of that, so --</p> <p>17 Q. Okay. There was also an article about</p> <p>18 MagneGas by --</p> <p>19 A. Yeah.</p> <p>20 Q. -- a blogger call Pump Stopper, correct?</p> <p>21 A. Absolutely.</p> <p>22 Q. Okay.</p> <p>23 A. And that -- and that created a lot of damage,</p> <p>24 because the first thing that everybody says is</p> <p>25 reporting the Pepijn van Erp article. So you see an</p>	<p>Page 97</p> <p>1 Q. Okay. Let me show you what I believe is a</p> <p>2 copy of that article --</p> <p>3 A. Yeah.</p> <p>4 Q. -- that Mr. Ermanno Santilli gave me. See if</p> <p>5 that's the article we're talking about.</p> <p>6 A. Yeah.</p> <p>7 Q. Okay.</p> <p>8 MR. PARRISH: And which exhibit is that?</p> <p>9 MR. LAKE: I'm sorry. So that's back to V26.</p> <p>10 MR. PARRISH: Thank you.</p> <p>11 THE WITNESS: Yeah. Yes, go ahead.</p> <p>12 BY MR. LAKE:</p> <p>13 Q. Okay. If you would look at the first page.</p> <p>14 A. Yeah.</p> <p>15 Q. You'll see there is some discussion of -- in</p> <p>16 the second paragraph of the article.</p> <p>17 A. Yes.</p> <p>18 Q. MMGA auditor was just barred by SEC for</p> <p>19 falsifying --</p> <p>20 A. Right.</p> <p>21 Q. -- backdated documents.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. You're not aware of Mr. van Erp reporting</p> <p>25 that, are you?</p>

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1 A. Excuse me?

2 Q. Did Mr. van Erp write anything about an
3 auditor of --

4 A. No. He published the article, so it's the
5 same thing as if he wrote it.

6 Q. And --

7 A. Maybe I need to -- the article was barred.
8 It happens all the time. And then another audit was
9 taken, and the other -- and the other auditor has to
10 review all the past job that the bad auditor did. So
11 the whole thing was forward. So it's not a big deal.
12 This is another example of insider enrichment, paid
13 promotion, done, done, done, so -- however, you know,
14 what I object to is that this was taken down and it's
15 still there now in Pepijn van Erp's thing.

16 Q. Okay.

17 A. So he didn't write that. Go ahead.

18 Q. This particular copy of this article comes
19 from a website called valuwalk.com.

20 Do you see that?

21 A. Yes.

22 Q. You're not aware of my connection between
23 this website and Mr. van Erp, are you?

24 A. Excuse me?

25 Q. Is there any connection that you know of

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1 Q. Okay.

2 A. Do you want this back?

3 Q. I don't have any more questions about it.

4 A. Oh, okay. Go ahead. Yeah.

5 Q. Thank you very much.

6 MR. RUGGERO SANTILLI: You should keep a
7 copy.

8 MR. PARRISH: I have it.

9 THE WITNESS: Excuse me?

10 MR. RUGGERO SANTILLI: No, no. I'm sorry.

11 My mistake. It was a mistake.

12 BY MR. LAKE:

13 Q. Okay. Let me show you an e-mail that
14 Mr. Parrish's office gave us and see if you recognize
15 this. It's marked V81.

16 (Exhibit V81 was marked for identification.)

17 THE WITNESS: Yeah, this is an e-mail I sent,
18 one of the several e-mails I sent.

19 BY MR. LAKE:

20 Q. Okay. And it's an e-mail to
21 info@pepijnvandererp.nl, correct?

22 A. Info@pepijnvandererp, yeah. And to Israel.
23 Yes, I got -- I think I got these two e-mails, yeah.

24 Q. Okay. And did you write this e-mail
25 yourself?

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1 between this website and Mr. van Erp?

2 A. I don't know.

3 Q. Okay.

4 A. I don't know. I cannot say. I'm not
5 involved with the day-to-day operation with MagneGas.

6 Q. But I think you mentioned earlier the company
7 went to court to try to find out who the Pump Stopper
8 is, correct?

9 A. No. I said that the company eventually was
10 able to have it done. If they went to court to find
11 out on that, I really don't know. Ermanno probably
12 knows more than I do.

13 Q. Okay.

14 A. But this has nothing to do -- we are talking
15 about March 2018. And it's something that publishes an
16 article in 2015 and 2018, was published. That's really
17 already past the lawsuit time. However, the article
18 that is published in 2015 is the one that's still on
19 the website of Pepijn van Erp.

20 Q. And you're not aware of any lawsuit
21 concerning this article, correct?

22 A. No, I'm not.

23 Q. Okay.

24 A. However, you know, I don't know -- Ermanno
25 probably said that, you see.

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1 A. Yes, I did.

2 Q. Okay. And you told the truth in it, of
3 course?

4 A. Yes.

5 Q. Okay. Did you send any other e-mails just to
6 Mr. van Erp? We'll talk about Dr. Israel in a second,
7 but are there other e-mails you sent to Mr. van Erp?

8 A. I'm trying to -- I made copies. Possibly,
9 yes. When he replied to me certain things, I replied
10 back.

11 Q. Okay.

12 A. But, you know, one of them said that, you
13 know -- as I said, I stopped because I was receiving
14 bad -- bad words from him, so I stopped writing. And I
15 have one that I think -- I have it somewhere in the
16 recent exhibits when he said that my husband was a
17 coward. So after that, I stopped writing.

18 Q. Okay.

19 A. And as you can see, these e-mails have always
20 been professional, very to the point, never insulted
21 him, and so forth. So he, you know --

22 Q. Thank you.

23 (Exhibit V82 was marked for identification.)

24 BY MR. LAKE:

25 Q. Let me show you an e-mail exchange we've

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1 marked V82 and see if you recognize that.

2 A. Yes.

3 Q. Okay. What is --

4 A. Professor Israel, yes. And in addition --
5 let me just see.

6 Q. Sure.

7 A. Yes. So, "I'm sorry to involve you in this,
8 but I have no choice since it appears that Skepsis and
9 the Pepijn van Erp website are controlled by the same
10 person," who is Pepijn, "and it is evident that the
11 website of Pepijn van Erp is just another extension of
12 the Skepsis, that it does the dirty job for Skepsis.

13 In fact, the same person controlled. In fact, the same
14 person controls both website and, more seriously, the
15 e-mail of its member. In fact" -- and you read
16 below -- I mean, I know it's a long thing. It says
17 don't look -- don't bother looking up the correct
18 e-mail address. All board member already have it --
19 have it there, because -- the reason why I wrote him is
20 because I sent an e-mail and the e-mail came back.

21 I said, you know, what happened? I tried to
22 write this to board members.

23 He said, Don't bother, because I -- I'm the
24 one in charge of the e-mail, and I already sent it to
25 them.

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1 me --

2 Q. Well, I'm asking because that seems to be an
3 issue, but let me show you --

4 A. Okay. Show me -- show me the thing.

5 Q. -- a letter, if I can find the exhibit
6 labels.

7 (Exhibit V83 was marked for identification.)

8 BY MR. LAKE:

9 Q. I'm sorry, Mrs. Santilli. That's V82, right?
10 Yes, okay. Thank you.

11 Let me show you a letter that's marked V83
12 and ask if you have seen this before.

13 A. "Dear, sir." So I don't -- oh, this is
14 Mr. Willem Nienhuys, yes. So --

15 Q. I believe that's -- if we look and compare
16 this letter, do you notice how Dr. Nienhuys spells his
17 middle name, W-i-l-l-e-m, on the letter, if you look on
18 the last page?

19 A. Which one? So can you show me? This one?

20 Q. I'm sorry. The last page of this letter.

21 A. So you're saying his correct name, yes. Jan
22 Willem Nienhuys.

23 Q. It's W-i-l-l-e-m, correct?

24 A. Yes.

25 Q. And if you compare that to the e-mail string

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1 So I don't know what else you want me -- as I
2 said, these are several e-mails. This was the first,
3 and the other one were the exchanges.

4 Q. Okay. And looking at the first e-mail
5 message -- well --

6 A. To whom?

7 Q. To the one at the top -- I'm sorry -- on the
8 very first page --

9 A. Yeah.

10 Q. -- "Hello, Professor Israel."

11 A. Yeah.

12 Q. I'm sure this is true of all of them, but I
13 just want to ask you about that in particular. You
14 told the truth in that e-mail, correct?

15 A. Yeah. Why would I not say the truth?

16 Q. I'm not suggesting you would. I just want to
17 make sure.

18 A. No, of course I said the truth, yeah.

19 Q. Okay. Great.

20 Now, you mentioned the return of an e-mail?
21 Is it possible that you just misspelled the name of the
22 person you were trying to send an e-mail to?

23 A. I don't know. I have no idea. Let me see.

24 Q. Okay.

25 A. It's possible. Why are you -- I mean, show

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1 that's in V82, it looks like you put an extra "L" in,
2 doesn't it?

3 A. Where is that?

4 Q. For example, if you look on the second page
5 from Carla Santilli at April 8th, at 5:42 p.m.

6 A. Info@skepsis. "Hi, Carla. Because you use
7 wrong e-mail address, it's no miracle it doesn't reach
8 Nienhuys." I don't know. It's possible. I could not
9 find that.

10 Q. Okay.

11 A. So what -- what kind of relevance does this
12 have?

13 Q. Well, I'm trying to fact clear --

14 A. The fact that we are called stupid, I cannot
15 see this. It's possible because this is a foreign
16 name. It's possible that I made a mistake.

17 Q. And I'm certainly not saying there is
18 anything wrong with a --

19 A. No.

20 Q. -- typographical error. But as I read the
21 e-mail string, you seem to think that Mr. van Erp was
22 hiding an e-mail from Dr. Nienhuys. And I just want to
23 point out --

24 A. No, I didn't say that.

25 Q. No. I just wanted to clarify that.

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1 A. I said -- I said -- he said -- he said -- let
2 me just see if you look at that.

3 Q. Sure.

4 A. I didn't say that he was hiding. I just said
5 that he is listed as the website -- as the webmaster,
6 and so he -- my idea is that he was collecting the --
7 he was collecting e-mails, that he was putting the
8 e-mails wrong in some way so he could collect them.
9 It's possible. But I don't see, because you use a
10 wrong e-mail address. And where is the e-mail address
11 that is wrong? I have a hard time.

12 Q. Okay.

13 A. Jan Willem. Oh, I don't know if it's wrong.

14 Q. Okay.

15 A. I'm not sure if it's wrong, but, you see,
16 that's not -- because he was listed. It's also
17 possible that the e-mail that they list is not correct,
18 so I don't know. I mean --

19 Q. Okay.

20 A. That's what I said. But I was -- I was
21 surprised at the fact that the -- I tried to send
22 e-mails to many people and none of them reach them.
23 And he said, Don't worry, I sent it to them. So that
24 means that he was keeping tab on the e-mails of people.
25 Webmasters do that all the time, so I wasn't really --

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1 A. So if he had written an e-mail with the
2 different address, I would have said, yes. But there
3 is no reason. Yeah. So, you know, who knows. If I
4 wrote this, it's because this was on the Internet.

5 Q. Okay.

6 A. And it's possible that they made a mistake,
7 or who knows.

8 Q. Okay.

9 A. But, you know, that's, I mean --

10 Q. Let me ask you just if you recognize --

11 A. I don't see any point.

12 Q. -- two other documents.

13 A. Yes.

14 Q. First V84 and then a similar letter, V85.

15 A. Yeah.

16 (Exhibits V84 and V85 were marked for
17 identification.)

18 BY MR. LAKE:

19 Q. Do you recognize those letters?

20 A. Well, I mean, the attorney only wrote them,
21 so I don't remember seeing that they sent a copy to me.
22 He told me that he wrote. I probably sent the exhibit,
23 but I truly -- you'll have to ask my attorney if he
24 wrote them. I don't remember seeing them. It's
25 possible that I -- I don't recall, you know. That was,

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1 I mean, it has nothing to do with his behavior of
2 the -- in the website.

3 Q. Okay.

4 A. And, actually, here Mr. Willem Nienhuys, I
5 don't see him writing an e-mail, so we --

6 Q. Okay.

7 A. We don't know whether his e-mail is, indeed,
8 the one I used.

9 Q. Okay.

10 A. We don't know, because it doesn't use his
11 e-mail. He only wrote letters, yeah. I don't see his
12 e-mail anywhere, so nobody can say my e-mail was wrong.

13 Q. Okay. But you -- let me just show you the
14 e-mail I was referring to and then we can move on.

15 A. Yeah. Maybe I'm looking at the wrong e-mail.

16 Q. If you look, for example, at the e-mail --

17 A. Yeah, this is the one I wrote.

18 Q. Yeah.

19 If you look at the spelling of Willem's name,
20 the Willem name, it appears it was typed W-i-l-l-e-l-m,
21 correct?

22 A. Right. But how do I know from here that it
23 is not, indeed, his own, because I don't see it's
24 published anywhere else?

25 Q. Okay.

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1 like, a long time ago.

2 Q. Okay.

3 A. I can see that. "Immediate legal action if
4 you cease and desist and retract," to Mr. Erp. It's
5 possible that he wrote them to me, but I have no idea.

6 MR. PARRISH: You may have given me the same
7 one twice.

8 THE WITNESS: So these are two, two of the
9 same.

10 MR. LAKE: Oh. All right.

11 MR. PARRISH: Let me see here real quick.

12 MR. LAKE: I'm sorry, yes. Let's do this.

13 BY MR. LAKE:

14 Q. V84 appears to be your letter to Dr. Israel.

15 Although it does say Mr. van Erp, I believe it's
16 addressed to Dr. Israel.

17 A. Say it again. It says "Dr. Israel."

18 Q. Okay.

19 A. Yeah.

20 Q. And that says Dr. Israel, right?

21 A. Dr. Israel, yes.

22 Q. Okay. And then V85 says, "Hosting2Go," but
23 it says Mr. Erp, correct?

24 A. Yes.

25 Q. Okay.

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1 A. But, you know, maybe it was somebody who
2 wrote the letter and made a mistake, a secretary.

3 Q. And I --

4 A. And Mr. Parrish, yeah, I see that.

5 Q. Okay.

6 A. But, I mean, these things happen all the
7 time.

8 Q. Sure.

9 A. I don't see -- like the issue as to
10 defamation, etc.

11 Q. But you're not familiar with those letters?

12 A. No, I'm not.

13 Q. Okay.

14 A. It's possible that he told us that he wrote
15 them, but, you know, I'm not really familiar.

16 MR. RUGGERO SANTILLI: I don't want to
17 interrupt, but we are senior people. We cannot
18 stay unless the questions are very, very
19 pertinent. I would appreciate Attorney Lake
20 restrain yourself to something of substance,
21 please. It would be appreciated.

22 MR. LAKE: I'm trying to get through this
23 material, Dr. Santilli. But this is a complicated
24 case with a lot of documents. And, believe me,
25 I'm not going to doing anything to keep you here a

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1 Were you involved in gathering documents in
2 response to our subpoena to Thunder Energies?

3 A. Yes, I did, because I'm -- I am the director
4 of Thunder Energies.

5 Q. Okay. Let me ask you if this appears, to
6 your recollection, to be a copy of that subpoena.

7 We're marking it V86.

8 (Exhibit V86 was marked for identification.)

9 THE WITNESS: So this is the original to
10 have. It doesn't have anything attached.

11 BY MR. LAKE:

12 Q. Right, that is the original document, I

13 believe --

14 A. Okay.

15 Q. -- is my understanding of the subpoena that
16 we sent you. Correct? Is that what that appears to be
17 to you?

18 A. Excuse me?

19 Q. Does that appear to be the subpoena we sent
20 Thunder Energies?

21 A. Yes, I think it is, yeah.

22 (Exhibit V87 was marked for identification.)

23 BY MR. LAKE:

24 Q. Okay. And what I would like to do is hand
25 you now V87, which is the response that we received --

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1 moment longer than is necessary.

2 MR. RUGGERO SANTILLI: Thank you.

3 MR. LAKE: In fact, why don't we take a
4 moment. I will look back through my notes. I may
5 have just a few follow-up questions.

6 THE WITNESS: Okay. That's fine.

7 MR. LAKE: And I may be done. I don't need
8 to make you sit while I do that.

9 THE WITNESS: Yeah. Okay. Go ahead. Look
10 through your notes.

11 THE VIDEOGRAPHER: At 3:33 p.m. we are off
12 the record.

13 (A recess was taken.)

14 THE VIDEOGRAPHER: At 3:41 p.m. we are on the
15 record.

16 BY MR. LAKE:

17 Q. Okay. Mrs. Santilli. Thank you for your
18 patience this afternoon. I am moving towards wrapping
19 up, so I'm going to move around to some different
20 topics --

21 A. Of course. Go ahead.

22 Q. -- as I look back through my notes.

23 A. Yeah.

24 Q. Just be patient, if you would, as you have
25 been, so thank you.

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1 A. Yes.

2 Q. -- and just go through the various
3 categories.

4 A. I think the responses were in two different
5 things, not just one. They were twice. There were two
6 responses, one, and then we received a letter saying
7 that you weren't happy, and we sent you the rest. So
8 this one is the first one.

9 Q. Okay. Yes, thank you. That's my
10 understanding as well, correct.

11 And, yes, you have V87 in front of you?

12 A. Yes, I have the first one.

13 Q. Okay. And if we compare the list of
14 documents that's in the subpoena to the response -- so
15 put them side by side, if you will. I wanted to ask
16 you about the different categories.

17 A. Yeah.

18 Q. My understanding is that the company, in
19 response to paragraph 1 when we asked for tax returns,
20 the response was none.

21 And my question is, does the company not file
22 tax returns, or were you just not producing them?

23 A. No. I think -- I think -- I don't know why
24 it was written "none," but we just felt that they were
25 not -- we don't have them. They are -- actually, they

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1 were in the hands who files them. But our bookkeeper
2 is in Minnesota, I think somewhere very far away, and
3 it was extremely convenient to have it on the short
4 time. That's it. So it says none. That was the
5 reason.

6 Q. Okay. So you do file tax returns?

7 A. Of course.

8 Q. Okay.

9 A. Of course. You think that we would be -- we
10 would be able to file SEC filings without tax returns,
11 you know?

12 Q. Right.

13 A. And as I said, I explained it to you.

14 Q. Yes.

15 And in response to paragraph 2, you referred
16 us to the sec.gov website for financial statements and
17 the like?

18 A. Yes.

19 Q. Okay. In response to paragraph 3, we asked
20 for meeting minutes, reports to shareholders, annual
21 reports or SEC filings --

22 A. Yes.

23 Q. -- concerning TEC from 201 to the present
24 relating to Ruggero Santilli or articles about him.

25 A. Yeah.

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1 Q. Number 6, any and all documents discussing,
2 listing, or otherwise relating to any event or article
3 that caused the devaluation of TEC as a company --

4 A. No.

5 Q. -- from 2010 to the present. You said none.

6 A. By the way, 2010 -- the company started
7 later, so 2010 is really not relevant.

8 Q. Okay.

9 A. No.

10 Q. But even if we went back to the year of its
11 founding, only --

12 A. No, we don't have --

13 Q. Still none?

14 A. I mean, we don't have anything that is
15 discussing listing -- let me see. Which one?

16 Q. Six.

17 A. Any of the documents discussing -- well, no.
18 TEC doesn't have them because we have them. We
19 never -- we never included -- TEC never filed a lawsuit
20 against anybody, so they are not supposed to have it.
21 We have them as the personal people --

22 Q. Okay.

23 A. -- personal plaintiff, not the company
24 plaintiff.

25 Q. Okay. Number 7, any and all documents

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1 Q. And the initial response was none. Let me
2 ask you, are you aware -- I don't recall seeing any
3 reports to shareholders relating to articles about
4 Dr. Santilli.

5 A. Not that I'm aware of.

6 Q. Do you recall any?

7 A. There are none.

8 Q. Okay. That's what I wanted to know.

9 Number 4, we asked for complaints, demand
10 letters, or other documents relating to allegations of
11 fraud, misrepresentation, or deception by TEC, and you
12 said none.

13 A. None of them, yeah.

14 Q. Okay. Number 5, any and all complaints,
15 demand letters, or other documents alleging a defect in
16 a product made or sold by TEC. And we were told none;
17 is that correct?

18 A. No, none, yeah.

19 Q. Okay.

20 A. No complaint.

21 Q. Okay. So, for example, no one has ever
22 returned a Santilli telescope?

23 A. Not that I know of, no.

24 Q. How many have been sold?

25 A. We have three.

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1 stating the amount of TEC dividends, if any, paid to
2 Ruggero Santilli or Carla Santilli from 2010 to the
3 present.

4 And we were told none.

5 A. None, no.

6 Q. You have not received dividends, correct?

7 A. Excuse me.

8 Q. The company --

9 A. No, we've not received it all. I mean,
10 company don't -- the board, they don't really -- they
11 don't really have any dividend.

12 Q. Okay.

13 A. Only big companies have dividends. They used
14 to have.

15 Q. Number 8, you sent us a link to the SEC
16 website.

17 A. Correct, yes.

18 Q. Okay. I understand that part.

19 Number 9, we asked for personnel files for
20 Ruggero Santilli, and we were told none. The company
21 has none.

22 A. There is none, no.

23 Q. Okay. Number 10, a similar question with
24 regard to Carla Santilli, and, again, we were told none
25 or there is no personnel file.

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1 A. None, yes.

2 Q. Okay. Numbers 11 -- I'm sorry, No. 12, 13,
3 14, and 15, you sent us links, and I see those. Thank
4 you.

5 Number 16, we asked for any and all documents
6 relating to invisible terrestrial entities, including
7 but not limited to articles alleging or questioning
8 their existence. And we were told none; is that
9 correct?

10 A. We don't -- we didn't receive anything --

11 Q. Okay.

12 A. -- because unless it's something credible,
13 the blogs have no value.

14 Q. Okay. With regard to documents relating to
15 J.V. Kadeisvili, No. 17.

16 A. No, we don't have anything.

17 Q. Have none.

18 Did he have any relationship with
19 Thunder Energies?

20 A. Not that I know of.

21 Q. Okay.

22 A. No, no.

23 Q. And No. 18 is a similar question about Luca
24 Petronio.

25 A. No. We have no file or resumé, nothing.

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1 purchase. So we are totally separately. And
2 for -- I think you should not add that question,
3 personally.

4 MR. RUGGERO SANTILLI: I agree.

5 MR. LAKE: All right. Let's see. I believe
6 we're up to 88 now, yes.

7 (Exhibit V89 was marked for identification.)

8 BY MR. LAKE:

9 Q. Let me show you an exhibit we've marked as
10 V88.

11 A. So this goes back to our --

12 Q. This stack here, yes. Thank you very much.

13 A. Okay. These are invoices, yes.

14 Q. Yes.

15 And so the record is clear, this is a series
16 of documents that were produced to us by
17 Thunder Energies. And we numbered them in the bottom
18 right-hand corner TE8 through 17 for ease of reference.
19 They did not arrive that way.

20 A. Say that again.

21 Q. Sure.

22 A. I don't understand.

23 Q. I'm just -- I'm just making clear on the
24 record that you see the number in the bottom right
25 corner?

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1 Q. Okay. And No. 19, no documents relating to
2 Pepijn van Erp, correct?

3 A. Not held by the company.

4 Q. By the company.

5 Okay. And 20, just to complete the set, no
6 documents relating to the explosion at MagneGas at
7 Thunder Energies?

8 A. Well -- no, of course we don't. But I have
9 serious questions about asking to a company that has
10 nothing to do with MagneGas to have something unless
11 there is some -- some attempt to create anxiety on me
12 and -- and, you know, I think it's a bad question put
13 here. While I accepted the one for MagneGas,
14 personally, I think that the attorney should object to
15 this one.

16 MR. RUGGERO SANTILLI: It's a violation of
17 the ethical rules of the bar association.

18 THE WITNESS: Because you think -- I think
19 this is a question that just starts to create
20 distressing me regarding -- reminding us of an
21 event that was very stressful, very bad in our
22 lives. We could have lost all the companies. We
23 could have lost everything. And this tack is
24 totally different from MagneGas. Our children
25 have no -- no shares, maybe like five shares in

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1 A. Yeah, V88.

2 Q. Well, over to the right.

3 A. Oh, there is another one.

4 Q. That's what I was referring to.

5 A. Oh, 8, 10.

6 Q. Right. So those are the page numbers.

7 A. Right, right. These are copies, pictures,
8 and support, yes.

9 Q. Okay. So you sent us these documents
10 through --

11 A. Yes.

12 Q. -- I think through Mr. Parrish's office,
13 correct?

14 A. Yes.

15 Q. Okay. And you mentioned a moment ago that
16 three of the Santilli telescopes have been sold. These
17 are the -- the invoices for these three, I guess?

18 A. One, two, and three, yes.

19 Q. Okay.

20 A. Let me see the third.

21 Q. Sure.

22 A. I don't see the third invoice.

23 Q. They're on back.

24 A. Oh, this one, yeah.

25 Q. I'm sorry.

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1 A. Oh, okay. I understand now what you're doing
2 here. Yeah, right, there are three.
3 Q. Okay. And so these are the only three that
4 you're aware of?
5 A. Yes.
6 Q. Okay.
7 A. No. That I'm aware of, of course.
8 Q. Yeah, I understand.
9 A. Better be aware.
10 Q. This may be a question I will ask -- I will
11 need to ask Dr. Santilli, but since you're here, I will
12 ask you.
13 A. Right.
14 Q. Do you know why the prices are different for
15 the three telescopes?
16 A. Because there are three different types of
17 telescopes. One is 100 -- it can expand more.
18 Q. Sure.
19 A. But is 150 millimeters, and the other
20 one is -- and they were different telescopes. And the
21 other one is -- why I don't find it. 100 millimeters,
22 100 millimeters, and 150.
23 MR. RUGGERO SANTILLI: 150, 100, and 100.
24 THE WITNESS: Yeah, let me see.
25 MR. RUGGERO SANTILLI: Three different sizes.

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1 THE WITNESS: Right. But one didn't have the
2 cameras. The first one didn't have the cameras,
3 so it was about \$2,000 less. Canon. You see ID
4 talks about Canon. The other one doesn't tell
5 you. There is somewhere the fact that there were
6 different types of telescopes.
7 BY MR. LAKE:
8 Q. Okay.
9 A. I mean, they have different -- how do you
10 say -- accessories.
11 Q. I understand.
12 Okay. And do you know what the -- what the
13 cost of these goods was to the company? I can see what
14 you sold them for, but what did the goods cost?
15 A. Well, unless I go to my bookkeeper, I would
16 not know for sure, but it seems that somebody who
17 claims to be an expert thinks that these are over --
18 they're very expensive. And I'm telling you these were
19 very expensive, because the Galileo telescope -- the
20 Galileo telescope has special lenses that needed to be
21 designed specially.
22 MR. RUGGERO SANTILLI: Santilli, the Santilli
23 telescope.
24 THE WITNESS: Excuse me. Yes, that's what I
25 mean, the Santilli telescope. The Galileo was

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1 more standard but still had to have -- still had
2 to adapted in the other one in parallel, so there
3 were -- it's not like you buy -- you buy on Amazon
4 a couple of telescopes that cost \$500 and you
5 resell them at 4- or \$5,000. It seems that people
6 who don't know what Galileo -- what the Santilli
7 telescope is, they think it's expensive. But
8 these people, they were doing research, and they
9 felt it was a good -- was a good value for them.
10 They discounted them, and that's all I can tell
11 you. I cannot say --
12 MR. RUGGERO SANTILLI: Carla --
13 THE WITNESS: -- anything else.
14 MR. RUGGERO SANTILLI: The cost of --
15 THE WITNESS: Right, I know. That's what I
16 was trying to say. Maybe China. Yeah, I know. I
17 mean, I was trying to add the people don't know.
18 But these lenses, they have to be made in China.
19 They have to be -- they have to be designed.
20 There have to be special tools.
21 They don't have tools for that. It was very
22 hard to find somebody to do it. And then they
23 have to be sent by mail -- excuse me, by airplane.
24 They go through the customs. You have to go and
25 pay the custom duties. And when they come back,

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1 you have to assemble them. And then you have the
2 technician who sets them up. I mean, this is --
3 somebody who says that this is -- these are
4 expensive, they're not qualified to judge any of
5 this.
6 BY MR. LAKE:
7 Q. Okay. Are you referring specifically to an
8 expert report in this case --
9 A. Exactly.
10 Q. Let me get the question out.
11 -- from USF Professor Maria Womack?
12 A. Yes.
13 Q. You've seen that report, that --
14 A. Yes, I did.
15 Q. Have you sent that report to anyone?
16 A. No.
17 Q. Okay. Are you aware of a copy of that being
18 posted on the Internet?
19 A. I don't know.
20 MR. RUGGERO SANTILLI: By a professor.
21 THE WITNESS: Yeah.
22 MR. PARRISH: No. If she -- it's her depo.
23 THE WITNESS: I'm not aware of that
24 because --
25 MR. RUGGERO SANTILLI: I apologize.

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1 THE WITNESS: -- I don't know.
 2 MR. RUGGERO SANTILLI: I apologize.
 3 BY MR. LAKE:
 4 Q. Okay.
 5 A. But that's all.
 6 Q. Okay.
 7 A. So maybe it's a question to ask to somebody
 8 else.
 9 Q. Okay.
 10 MR. RUGGERO SANTILLI: Talk to the University
 11 of South Florida.
 12 BY MR. LAKE:
 13 Q. We talked earlier about Mr. Wainwright and
 14 Mr. Tadsen --
 15 A. Yes.
 16 Q. -- who you know were deposed last week.
 17 Did you work with them on their affidavits in
 18 this case?
 19 A. I just told them there was an affidavit that
 20 needed to be -- that they told me to ask, because we
 21 decided that we were going to file an injunction
 22 because of this particular sentence, "The Continuing
 23 Stupidity of Ruggero Santilli," was -- all they did is
 24 to ask the judge to change that. And when we talked to
 25 them and they said that's exactly what happened, that

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1 people -- they explained what happened. So they --
 2 they brought certain things, and they told me probably
 3 to review it. And then they went in front of a -- and
 4 then they signed it.
 5 Q. Okay.
 6 A. So that's all I did.
 7 Q. Okay. So -- and I don't want to know about
 8 your conversations with Mr. Parrish, but it sounds like
 9 you coordinated and --
 10 A. Exactly.
 11 Q. -- and helped them get it signed?
 12 A. Obviously, I needed to coordinate.
 13 Q. Okay.
 14 A. We also, by the way, since you -- we also
 15 tried to get two similar affidavits from Georgiev and
 16 the other professor, and they refused because they were
 17 afraid of being criticized and defamed, that their name
 18 would be all over pasted in the Internet, because I
 19 asked specifically to the attorney if there were going
 20 to be private information. And there was no guarantee
 21 that Pepijn van Erp would see that -- would not see
 22 them, so when they -- they knew that.
 23 Q. Okay.
 24 A. They didn't want to be involved.
 25 Q. Okay. When you say Georgia, do you mean

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1 Georgia in the United States --
 2 A. Georgiev, yes.
 3 Q. -- not --
 4 A. No. Georgiev.
 5 Q. -- Georgia in the former Soviet Union?
 6 A. The one -- the one who signed the document,
 7 the one who signed this.
 8 Q. That's fine. All right. You don't
 9 need to --
 10 MR. RUGGERO SANTILLI: This series of books.
 11 BY MR. LAKE:
 12 Q. You've answered the question.
 13 A. Okay. These are the -- these are the two
 14 names. Okay? [Inaudible], he's in Florida and didn't
 15 want to sign anything. He said, I had enough of these
 16 problems with people interfering with my job, because
 17 he was the chairman of this whole thing, and he was
 18 highly distressed and highly embarrassed.
 19 And this one was Svetlin Georgiev. And this
 20 one is in France, so we didn't even attempt it. So
 21 just tell you --
 22 Q. Sure.
 23 A. -- we attempted to coordinate.
 24 Q. Okay.
 25 A. You know, you've seen that already.

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1 Q. Yes, yes.
 2 A. Because one -- I mean, another thing we are
 3 trying to do is to have an injunction asking the judge
 4 to -- I think he did -- to remove the fact that -- that
 5 our computer fabricated this and that we somehow
 6 doctored the signatures. So we were trying to have an
 7 affidavit. And they were afraid, and they did not do
 8 it.
 9 Q. Okay. And just so the record is clear --
 10 A. Yeah.
 11 Q. -- we're talking about the technical
 12 achievement award?
 13 A. Exactly.
 14 Q. And the people who you asked for affidavits
 15 were Professor Seenith Sivasundaram?
 16 A. Right, right.
 17 Q. -- and Professor Georgiev?
 18 A. Georgiev, exactly.
 19 Q. Thank you very much.
 20 A. And they refused because they were afraid.
 21 Q. Thank you very much.
 22 A. Let me just put this back.
 23 Q. Let me ask you about just a couple of other
 24 names we've come across in the case, people you may not
 25 know. And if not, that's fine.

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1 Sherry Stone. Do you know who Sherry Stone
2 is?
3 A. Oh, Sherry Stone is a woman who works for us.
4 Q. Okay. And what is her position?
5 A. She's our secretary, yeah, for the press,
6 mainly, but, you know, if she has to go and buy
7 something for us, she does it for the companies. She
8 does.
9 Q. Sure.
10 How about Richard Cox? Do you know anyone by
11 that name?
12 A. I don't know who Richard Cox is.
13 Q. How about William Pound, William, P-o-u-n-d,
14 Pound?
15 A. I don't know.
16 MR. RUGGERO SANTILLI: That's twenty years
17 ago.
18 THE WITNESS: I don't know. Some of these
19 names may be like many, many years ago, but
20 Sherry --
21 BY MR. LAKE:
22 Q. I understand.
23 A. -- is a recent person.
24 Q. I understand.
25 There are a number of mainstream scientists

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1 THE WITNESS: Hold on. I mean, I never --
2 why -- I never insulted him. If the other people
3 insult him, it's their problem, not mine. I never
4 wrote anything negative about him --
5 BY MR. LAKE:
6 Q. Okay.
7 A. -- except being very, very upset and ask, you
8 know, and kind of -- kindly asking him to be a decent
9 person.
10 MR. RUGGERO SANTILLI: And they're wasting
11 your time.
12 BY MR. LAKE:
13 Q. You don't have any evidence specifically
14 about Frank Israel's involvement in the --
15 A. Yes, I do.
16 Q. -- van Erp article, do you?
17 Okay. Tell me --
18 A. Yes, I do.
19 Q. -- what that is.
20 A. Actually, it's interesting that when I
21 started to look more carefully at what this whole thing
22 was, I found things in his -- in his Kloptdatwel blog
23 starting of teaching Skepsis, starting in 2011. And I
24 realized that this thing was going on. What they did,
25 they were writing in the blog of teaching Skepsis of

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1 who disagree with Dr. Santilli, aren't there?
2 MR. PARRISH: Object to form.
3 THE WITNESS: Oh, yes, there are.
4 BY MR. LAKE:
5 Q. He's been the subject of criticism, correct?
6 A. Yes, by -- depending on what you -- define
7 "criticism." If you find criticism writing articles
8 and debating the science, I think is very healthy for
9 the -- if you find criticisms calling people names and
10 saying that they're liars and cowards, nobody -- nobody
11 ever did that.
12 Q. Gotcha.
13 A. Just the defendants.
14 Q. So you would disagree -- or let me ask you
15 this way: You would not approve of Mr. Tadsen last
16 week saying Pepijn van Erp is an imbecile, would you?
17 MR. PARRISH: Object to the form.
18 THE WITNESS: Excuse me.
19 BY MR. LAKE:
20 Q. Last week in his deposition, Mr. Tadsen said
21 that Pepijn van Erp is an imbecile. And you think he
22 should not have said that?
23 MR. PARRISH: Object to form.
24 THE WITNESS: I cannot --
25 MR. RUGGERO SANTILLI: She don't know this.

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1 the Dutch Skeptical Association, all these -- all these
2 things. And then Pepijn van Erp at some point said, I
3 decided to write it -- to translate it into Italian --
4 in English, so he created his own blog. So the whole
5 thing started right there. So if Frank Israel allowed
6 a company to insult and to be so defaming of another
7 person, I mean, he should be -- he is involved.
8 Q. Okay.
9 A. I mean, because he is responsible for what
10 happened in his association.
11 Q. Let me --
12 A. He's the chairman. And he said we -- Pepijn
13 and myself are occasionally contacted. I mean, he --
14 and Pepijn is the webmaster of the entire organization.
15 MR. RUGGERO SANTILLI: The letter, Carla, the
16 letter that you wrote.
17 THE WITNESS: Excuse me?
18 MR. RUGGERO SANTILLI: The letter that you
19 wrote to Israel.
20 THE WITNESS: Yeah, yeah, of course. No, the
21 question was different.
22 BY MR. LAKE:
23 Q. Let me ask you about the three things that I
24 heard you mention.
25 A. Yeah.

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- 1 Q. The Kloptdatwel blog.
 2 A. Yeah.
 3 Q. And forgive me. I may not be pronouncing it
 4 right, but I think we're talking about the same thing.
 5 How do you connect that to Dr. Israel?
 6 A. To?
 7 Q. Yeah.
 8 A. Well, yes. That is an official blog written
 9 in the Wikipedia. If you go to Wikipedia, they talk
 10 about this teaching Skepsis --
 11 Q. Okay.
 12 A. -- and that they describe the association.
 13 They describe the publication. I don't remember what
 14 it is. They described it in their conferences. And in
 15 the bottom it says that that was the blog of the
 16 organization. And that if you go and look for it, the
 17 same -- the same -- it's all part of the same website,
 18 so -- and the blog mainly is really -- is a blog, but
 19 in reality, it was pieces of -- pieces of articles
 20 written in Dutch about Ruggero, about this whole thing,
 21 MagneGas, da, da, da. And those were translated later
 22 on in the -- in the website in English.
 23 Q. Okay. Anything else to connect Frank Israel
 24 to Pepijn van Erp's articles?
 25 A. Well, he said that he's the chairman, and

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- 1 THE WITNESS: Yes, I do.
 2 BY MR. LAKE:
 3 Q. Is it your belief Mr. van Erp is an employee
 4 of Skepsis?
 5 A. Oh, well, I don't know.
 6 Q. You don't know?
 7 A. I don't know. You've have to ask him,
 8 because I don't know if he gets money from this
 9 organization or not.
 10 Q. Okay. You would agree that if an author, a
 11 Hadronic press author, had a personal website, that you
 12 would not be responsible as CEO for his personal
 13 website, would you?
 14 A. If he translated the Hadronic Press material
 15 in his personal website, if he adds a few insults here
 16 and there, I would be very upset.
 17 Q. Sure.
 18 A. But I cannot be responsible if he -- I
 19 would -- I cannot -- he is definitely responsible
 20 because -- if I authorize him to do so.
 21 Q. If you authorized him to do so?
 22 A. No. Yeah.
 23 Q. But if you did not, if you were completely
 24 unaware of it --
 25 A. Right. But, you know, there is no -- he said

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- 1 he's the website -- he's the webmaster of the
 2 organization. I mean, that's -- to me, it's very
 3 powerful.
 4 Q. Just to be clear, Mr. van Erp is the
 5 webmaster, right?
 6 A. Yes.
 7 Q. Okay. I just wanted to follow up on --
 8 MR. RUGGERO SANTILLI: You asked for the --
 9 BY MR. LAKE:
 10 Q. I just wanted to make sure I knew which
 11 person.
 12 A. Yeah, right. And they appeared in all the
 13 pictures and everywhere in Wikipedia --
 14 Q. Okay.
 15 A. -- and everywhere, so I don't see how it
 16 cannot be connected.
 17 MR. RUGGERO SANTILLI: Carla, [inaudible] for
 18 Israel.
 19 THE WITNESS: Right. I was saying Israel,
 20 Ruggero.
 21 BY MR. LAKE:
 22 Q. I understand now. Thank you.
 23 A. Yeah, we understood.
 24 MR. RUGGERO SANTILLI: Okay. Pay attention
 25 to what I say, Carla.

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- 1 himself that he is writing this because I need to
 2 translate what Frank Israel wrote, allowed me -- I'm
 3 not using the right word, but that he is translating
 4 into the blog, so --
 5 MR. RUGGERO SANTILLI: In Dutch.
 6 THE WITNESS: So at this point, he's
 7 responsible for his English, and Frank Israel is
 8 responsible for his Dutch. So you see, they're
 9 both responsible.
 10 MR. RUGGERO SANTILLI: The origination is
 11 Dutch.
 12 BY MR. LAKE:
 13 Q. Tell me where -- and I may have misunderstood
 14 your answer, but I'm trying to follow.
 15 Did you say you read Mr. van Erp said he
 16 needed to translate --
 17 A. No. He said -- he didn't say he needed.
 18 Q. Okay.
 19 A. I don't have it in front of me.
 20 Q. Okay.
 21 A. At some point he said in his website that he
 22 produced the English translation of --
 23 MR. RUGGERO SANTILLI: Dutch.
 24 THE WITNESS: -- the teaching Skepsis, and he
 25 felt that he needed to do it in English so

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1 everybody understands, because he wrote many
2 things, not just about -- he has his own list of
3 articles that he writes, although none as long as
4 Santilli's articles.

5 MR. LAKE: Okay.

6 MR. PARRISH: Jim, how much more time do you
7 have?

8 MR. LAKE: I don't think I have any more
9 questions.

10 THE WITNESS: Okay.

11 MR. PARRISH: I just have one quick question.

12 CROSS-EXAMINATION

13 BY MR. PARRISH:

14 Q. Carla, can you tell me what your degree was
15 in, your master's degree was in?

16 A. It was a domestic degree in social work with
17 the specialization in administrative services.

18 Q. So you don't have any type of degree in
19 science or any type of technical degree?

20 A. No, I don't.

21 Q. All right. And you wouldn't want someone to
22 rely on any testimony today that would be technical in
23 nature?

24 A. Oh, absolutely not.

25 MR. PARRISH: Okay. That's all I have.

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1 very quick.

2 MR. RUGGERO SANTILLI: You have plenty of
3 time.

4 THE WITNESS: A very quick statement.

5 MR. PARRISH: Make the statement to the court
6 reporter.

7 THE WITNESS: Because I think that -- one of
8 the things that we -- the discussion was how can
9 you prove that there's damage? How can you prove
10 damage? How can you prove you lost value of the
11 stock?

12 But in addition to that, there is a whole
13 other type of personal damage. First of all, when
14 you call a scientist stupid and dishonest and a
15 fraud, you affect his ability to perform his work,
16 because his work is based on his reputation. And
17 when you attack the reputation of a person, you
18 attack his work. And I'm part -- I mean, we share
19 the same expenses, so at that -- so it creates
20 damage to my own pocket as well.

21 In addition, if you call a person like that
22 when he goes out and he has five patents, if you
23 go out, the patent attorney is going to go on the
24 Internet and say, Oh, my goodness, this man is
25 fraudulent, so what he writes I cannot trust,

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1 THE WITNESS: Even if maybe -- you know,
2 that's it, no. I don't have any --

3 MR. PARRISH: That's all I have.

4 THE WITNESS: -- technical thing.

5 MR. LAKE: Do you want to advise her about
6 reading?

7 MR. PARRISH: So now you have an opportunity
8 to -- since your deposition is complete, you have
9 the opportunity to read the deposition so that you
10 can make sure there is no typographical errors, or
11 things like that like --

12 THE WITNESS: Yes, yes.

13 MR. PARRISH: -- spelling mistakes, things --

14 THE WITNESS: Do I have the opportunity of
15 say something that kind of reflects how
16 destructive this whole thing has been in our
17 lives? I really would, because I want to --

18 MR. PARRISH: Well, if you would like to make
19 a statement right now, we can do that. We can --
20 I can just --

21 THE WITNESS: I misunderstood you.

22 MR. PARRISH: Are you wanting to make some
23 type of statement?

24 MR. RUGGERO SANTILLI: Yes, yes.

25 THE WITNESS: Like three words, five words,

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1 because there's all these accusations of fraud.
2 So this is No. 1.

3 Number 2, the personal issue is the
4 following. I want to give you two examples in
5 which we were personally damaged in our social and
6 professional life. The first one in the -- I
7 think it was in the beginning of 2015 and 2016.
8 We were invited in Miami by the Miami Yacht Club
9 to talk about, I think, energies, about different
10 things, MagneGas.

11 MR. RUGGERO SANTILLI: And the Rotary Club
12 too.

13 THE WITNESS: Yeah.

14 MR. RUGGERO SANTILLI: It was a joint
15 invitation.

16 THE WITNESS: No, no, Ruggero. Let me just
17 finish this, because that's what I recall, the
18 Miami Yacht Club.

19 So we went there. And, actually, we were
20 kind of supported by the Italian government in
21 terms of recommending us to go there and represent
22 the -- we had an Italian scientist who was coming
23 and talked to them.

24 So we went. There were about -- this was
25 very social, a very simple thing, very -- some

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1 science translated for the public. So there were
2 about 40 people. It was people -- not because
3 it's Ruggero, because he's an excellent speaker.
4 He has a way of really getting people enthusiastic
5 about his ideas, and he explains it. So he
6 explained the whole thing. And everybody was so
7 excited.

8 So one of the people came and says, Oh,
9 Dr. Santilli, when you come back to Miami, we
10 would like you to go to come talk to the Rotary
11 Club, which is another organization, and you can
12 have a similar speech.

13 Okay. That's good.

14 And then a few days later, this person writes
15 us and says, you know, I really must say that we
16 cannot -- we had to cancel the Rotary, because the
17 Internet is too unfriendly to you. These are the
18 words that he used. So that, you know, is not fun
19 to have thrown in your face.

20 The second time -- and this is more serious,
21 and this has to do with the fact -- okay. In June
22 of 2017, last year, we went to meet some
23 colleagues, astrophysicists and physicists, from
24 the area of Milan and Venice. And we went in the
25 town of Cortina d'Ampezzo, which is in mountains

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1 all of our friends were with us, the friends from
2 the universities.

3 And we came in and they say, you know -- they
4 were very embarrassed. They said, you know, we
5 don't -- we know they are lies, you know. You
6 have so many bad things on the Internet I
7 cannot -- that I cannot -- we cannot really make a
8 big case for you to bring the telescope, because
9 there are too many bad things written about you,
10 and we would be embarrassed in front of our
11 friends. Basically, they would not even allow us
12 to talk.

13 So our friends wrote a letter, close to --
14 the lawsuit had already started. They wrote a
15 letter to Frank Israel and Pepijn van Erp saying,
16 Listen, this is the time that you stop to have
17 placing all over the Internet this horrible thing.
18 If you just remove, I know that I can -- we can
19 talk to the Santillis to see if we can find some
20 agreement in which you leave some so you don't
21 feel that your liberty of speech or freedom of
22 speech is impeded. Let me know. Maybe you change
23 the title. Maybe you -- they wrote a letter to
24 them. I don't have the copy of the letter. I'm
25 not -- I'm not releasing the names. But this is

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1 north of -- north of Venice.

2 Our friends met us there, and we brought the
3 telescope. They wanted to see the telescope.
4 They wanted to see how it worked, etc., etc. And,
5 also, because in that area they had an
6 observatory. Being very high in the mountains,
7 the sky is very clear at night. It's a beautiful
8 opportunity.

9 So we went, and as we were -- I don't
10 remember if it was in the hotel or the restaurant.
11 People saw us with the telescope, and we started
12 to talk. And then that gentleman said, Oh, this
13 is great. Why don't we -- we invite you to use
14 the -- to use the observatory. But before, why
15 don't you come tonight. In town they had a
16 very -- they had an office where they had like a
17 gathering place for this association of
18 astronomers. These are scientists. These are
19 amateur scientists, because amateur astronomy is
20 like a big thing.

21 So they said, Oh, wow, I see that you have a
22 telescope. I see that it's so exciting. You're
23 talking about antimatter, etc., etc.

24 So here we are driving around Cortina
25 d'Ampezzo with the big suitcase, the computer, and

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1 under sworn testimony that those two episodes
2 happened.

3 And then, you know, this is two episodes. In
4 addition to that, you need to talk to your
5 grandchildren and say, How come grandfather is
6 called stupid? I mean, there is a lot of things
7 that it has to do, of course, you know. That's --
8 I think this is the end.

9 MR. RUGGERO SANTILLI: That's why we expect
10 millions of dollars of payment, Carla.

11 THE WITNESS: Okay. Plus, like we went to --
12 another story. We went to the Italian council
13 meeting in Ybor City. There was a big meeting of
14 the Italian community. And, frankly, I didn't get
15 my card out. I don't want them to go and see the
16 Internet, that we are called stupid, the two of
17 us, you know.

18 Let's face it, it's a very -- it's a very
19 stressful situation. And I think it has to be
20 presented as big damage. I'm not an emotionally
21 impaired person because of that. I know better,
22 but, definitely, I'm very upset.

23 MR. LAKE: Okay. Thank you very much.

24 MR. PARRISH: She'll read if it's ordered.
25 I'll explain it.

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1 THE VIDEOGRAPHER: At 4:17 p.m. this now ends
 2 the deposition of Carla Santilli, and we are going
 3 off the record.
 4 (Deposition concluded at 4:17 p.m.)
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1 REPORTER'S CERTIFICATE
 2
 3 STATE OF FLORIDA
 4 COUNTY OF HILLSBOROUGH
 5
 6 I, Aaron T. Perkins, Registered Merit Reporter
 7 and Certified Realtime Reporter, certify that I was
 8 authorized to and did stenographically report the
 9 deposition of CARLA SANTILLI; that a review of the
 10 transcript was requested; and that the transcript is a
 11 true and complete record of my stenographic notes.
 12
 13 I further certify that I am not a relative,
 14 employee, attorney, or counsel of any of the parties,
 15 nor am I a relative or employee of any of the parties'
 16 attorneys or counsel connected with the action, nor am
 17 I financially interested in the action.
 18
 19 Dated this 3rd day of May 2018.
 20
 21
 22
 23
 24
 25

 Aaron T. Perkins, RMR, CRR, CRC

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1
 2 CERTIFICATE OF OATH
 3
 4 STATE OF FLORIDA
 5 COUNTY OF HILLSBOROUGH
 6
 7 I, the undersigned authority, certify that
 8 CARLA SANTILLI, personally appeared before me and was
 9 duly sworn.
 10
 11 WITNESS my hand and official seal this 3rd day
 12 of May, 2018.
 13
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 Aaron T. Perkins, RMR, CRR, CRC
 Notary Public - State of Florida
 My Commission Expires: 3/1/2020
 Commission No. FF966216

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1 SIGNATURE PAGE
 2
 3 Please attach to the deposition of CARLA SANTILLI taken
 4 on April 16, 2018, in the case of RUGGERO SANTILLI and
 5 CARLA SANTILLI and PEPIJN VAN ERP, et al.
 6
 7 PAGE LINE CORRECTION AND REASON THEREFOR
 8
 9
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 17
 18 I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY
 19 CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY
 20 SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.
 21
 22
 23
 24
 25

 CARLA SANTILLI DATE

 WITNESS TO SIGNATURE DATE