

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

RUGGERO SANTILLI and CARLA
SANTILLI,

Plaintiffs,

vs.

Case No.
8:17-cv-1797-T-33
MAP

PEPIJN VAN ERP, et al.,

Defendants.

VIDEOTAPED

DEPOSITION OF: RUGGERO M. SANTILLI

DATE: April 16, 2018

TIME: 9:59 a.m. to 12:24 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

Volume 1
Pages 1 to 129

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1 APPEARANCES:
2
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14 Attorneys for Defendants

15 ALSO PRESENT:

16 Carla Santilli
17 Dave Fuhrmann, videographer
18
19
20
21
22
23
24
25

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1 EXHIBIT INDEX CONTINUED AS FOLLOWS:

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V36 Proposal to Develop
4 the New Netron Gun.
5 Exhibit A grant application Page 25
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6 4040-0010.
7 Exhibit A Thunder Energies Page 28
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8 announcement dated
9 February 9, 2016.
10 Exhibit A listing of videos. Page 31
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11 Exhibit LinkedIn biography. Page 36
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13 Exhibit An "author page" from Page 37
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15 Mathematical Problems
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V30 Sample of Defamating
10 Websites by Defendant
11 Frank Israel.
12 Exhibit A Google search Page 22
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13 Exhibit Biographical notes of Page 22
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14 Santilli.
15 Exhibit A biography from the Page 22
V33 Institute for Basic
16 Research website.
17 Exhibit 10-K for Page 23
V34 Thunder Energies
18 Corporation for the
19 year ended December
20 31, 2017.
21 Exhibit An article titled, Page 24
V35 New Initiatives for
22 Nuclear Detection and
23 Monitoring and
24 Verification
25 Technologies.

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3 Exhibit An article from the Page 46
V44 American Journal of
4 Modern Physics
5 entitled, Apparent
6 Detection via New
7 Telescopes with
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11 Entities (ITE).
12 Exhibit A document titled, Page 54
V45 Flaky Academic
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14 Exhibit An article entitled, Page 61
V46 Beall's List of
15 Predatory Journals
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18 Exhibit An e-mail with the Page 63
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19 Criminal charges
20 against Maria and
21 Christian Corda.
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23 Exhibit A domain document for Page 71
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24 Exhibit Website contact page Page 75
V49 for the R.M. Santilli
20 Foundation.
21 Exhibit Domain information Page 77
V50 for ibr.org from Pair
22 Domains.
23 Exhibit Web page printouts Page 109
V51 from the Institute
24 for Basic Research,
25 dated April 9, 2013.
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27 Exhibit An article entitled, Page 111
V52 Denunciation of
28 Obscurantism at CERN.

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1 THE VIDEOGRAPHER: This is DVD No. 1 to the
2 videotaped deposition of Ruggero Santilli, in the
3 matter of Ruggero Santilli and Carla Santilli vs.
4 Pepijn van Erp, et al., Case
5 No. 8:17-cv-1797-T-33MAP. This deposition is
6 being held at Riedsorph Reporting Group located at
7 3411 Alternate 19 North, Suite A, Palm Harbor,
8 Florida.

9 Today's date is April 16, 2018, and the time
10 is 9:59 a.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: My name is Joe Parrish for the
17 plaintiffs.

18 MR. LAKE: Jim 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 RUGGERO M. 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 it?

2 A. Of course.

3 Q. Will you ask me to clarify it?

4 A. Yes, of course I will ask.

5 Q. Thank you.

6 A. That seems to be obvious, yes.

7 Q. And if at any point during the morning you
8 need to take a break for any reason, just let me know,
9 and we'll take a break at that time.

10 A. Noted and accepted.

11 Q. All right. I do have a number of questions
12 for you. I understand you would like to make an
13 opening statement, and I don't have any objection to
14 that, but if you could, keep it brief, because we do
15 have a number of questions to cover. And if at the end
16 of my questions you want to say more, Mr. Parrish will
17 have the opportunity to ask questions, and you can put
18 on anything you would like to say at that point.

19 A. I object strongly about the limitation of
20 time. We have seven hours that you can interview me,
21 so please --

22 Q. That's true.

23 A. -- please do not ask nor make a claim that
24 there's not enough time. You'll have plenty of time of
25 asking any question that you want.

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1 BY MR. LAKE:

2 Q. Dr. Santilli, good morning. I know we met
3 briefly prior to the depo, but for the record, my name
4 is Jim Lake. I'm here today to ask you some questions
5 regarding a lawsuit that you and Mrs. Santilli brought.

6 A. I ask -- sorry to interrupt, but I'd ask for
7 an introductory statement.

8 Q. I understand. I understand. I will -- I
9 will allow you to make your introductory statement.

10 A. Okay.

11 Q. Just a couple things that I need to go --

12 A. Go ahead.

13 Q. -- over first --

14 A. Go ahead.

15 Q. -- on the procedure.

16 A. Go ahead.

17 Q. I know you've been deposed before, so I won't
18 belabor the points, but just a couple of things. We
19 will be asking questions. And if a question I ask is
20 unclear or confusing or doesn't make sense, will you
21 please let me know? And I will be happy to clarify it
22 for you.

23 A. Can I make the introductory statement?

24 Q. Well, would you answer my question first? If
25 I ask you a question that's unclear, will you answer

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1 Q. Thank you very much.

2 A. Can I now make an introductory statement or
3 not yet?

4 Q. Of course, please.

5 A. Okay. Now, my name is Ruggero Maria
6 Santilli. I am a senior U.S. scientist. And I have
7 been -- I was invited to come from Italy as -- with
8 NASA's support. I went to nine years Boston
9 University, and then I was a member of MIT. It was a
10 great honor for me. And then I spent a number of years
11 at Harvard University under the support from the
12 Department of Energy. And then after that, I passed --
13 I became -- doing research for the corporate field.

14 In regards to this lawsuit, I would like to
15 ask that certain documents must be on the record to --
16 whatever the cause.

17 The first document that I'm asking to be on
18 the record is the list of five -- five websites that
19 are extremely slanderous in their URL -- claiming in
20 the URL, The Stupidity of Ruggero Maria Santilli --
21 that have been published, first, by Frank Israel in
22 Dutch in his official website of the Skeptics Society,
23 and then translated in English, the English version
24 translated by the employee van Erp, not only in
25 English, but also French, Italian, and other languages.

<p>Page 10</p> <p>1 Document No. 2 that I request to be on the 2 record, because this is fundamental for those -- the 3 introductory documents are fundamental for the trial. 4 It's Document No. 2, is a search under my name, a 5 Google research. You can see the appearance of my 6 article, my slanderous article by Arthur Rubin, David 7 Epstein, Mark Bernstein, the controllers. They're not 8 editors. It would be a dishonor for America to call 9 them editors. They're the controllers of my article. 10 Immediately below them, there is the 11 defamatory -- the defamatory website, two of those -- 12 several. 13 Now, here is the point that I want to be on 14 the record; namely, when we go on trial, I reserve the 15 duty to prove to the jury that it is impossible for a 16 website such as this one, "The Stupidity," to be 17 systematically second in line under Wikipedia for seven 18 consecutive years without the participation and the 19 approval and the assistance by Google. It is 20 impossible. This would be the most rated by 21 definition. 22 So this is a fundamental point for the main 23 aim of this trial. That's why my wife and I, we filed 24 this trial. There's a conspiracy in the United States 25 of America against advanced research, that I will</p>	<p>Page 12</p> <p>1 documentation of the activity of the company in 2 2010 -- I'm sorry, 2018. And for questions 3 pertaining to the activity of the company, I must 4 refer to this important -- to this important 5 document, because rather than just -- finally, I 6 request to file -- I request to file -- the rest I 7 may ask to be filed later on. 8 The third and final documents that I request 9 to be filed, those are copies of three -- a number 10 of grant applications that I filed as CEO of 11 Thunder Energies Corporation to our military. 12 The first is an application to the Defense 13 Threat Reduction agency of the Department of 14 Defense. In this application, we proposed that 15 our company, Thunder Energies Corporation -- I'll 16 call it TEC here on. 17 Our company completes the available Netron 18 source into a nuclear weapon detection station, 19 because at this moment we Americans do not -- we 20 are completely unable to ascertain as to whether a 21 suitcase going through the Tampa airport to New 22 York, whether that suitcase contains nuclear 23 weapons or not. Uranium-235 is a permanently 24 stable metal, so, therefore, with the current 25 equipment, it is detected as another piece of</p>
<p>Page 11</p> <p>1 posit, by organized interest on Einstein. And I have 2 been one of the many, many victims. We love America, 3 and that's why we filed this lawsuit. 4 Next, I would like to -- and I will move very 5 quickly now, Mr. Lake. 6 Q. Thank you. 7 A. Next, I would like to be online my 8 curriculum. First, a summary, because my curriculum 9 is -- this is part of my curriculum. It's a hundred 10 pages. And this is just a summary, because I may -- I 11 request this to be online because I may refer to it. 12 So unless there's a record, it's just, blah, blah, 13 blah. 14 Okay. Next, I want to be on the record. I 15 am acting today as the CEO of a United States publicly 16 traded company Thunder -- am I speaking too fast? 17 THE REPORTER: You're good. 18 THE WITNESS: Tell me, please, if I'm 19 speaking -- 20 THE REPORTER: Thank you. 21 THE WITNESS: -- just say, Ruggero. 22 I'm acting as the chief executive of 23 Thunder Energies Corporation. And I want to be 24 this on file, the 10-K that we just recently filed 25 and supervised the totality -- the totality of the</p>	<p>Page 13</p> <p>1 steel. 2 This is an application where the only way to 3 detect nuclear weapons or material is by 4 irradiating them with a Netron source, and we've 5 got it. This is an application for the Defense 6 Threat Reduction Agency that was denied. In due 7 time to the jury I will indicate the reason -- the 8 reason and the evidence why. 9 Secondly, now this is -- this case, 10 gentlemen, all of you in this room are Americans. 11 This is a time to see whether you're a real 12 American or, one way or the other, you favor 13 foreign interests interfering in our -- in our 14 threats of direct national security. 15 Here is another -- here is another proposal. 16 This time, this one was filed to Tampa. Everybody 17 can see that we produce a neutral flux, a very low 18 energy for use in airports. The technology can be 19 multiplied and can be brought to a very high level 20 instead of being a low energy; now, for an 21 airport, a very, very low energy Netron. 22 Otherwise, it cannot be used in a public area. 23 But the technology can be implemented to use very 24 high energy -- any higher energy Netron. 25 What do you end up with? You end up with a</p>

<p>Page 14</p> <p>1 basically new weapon for our country. It's called 2 the Netron gun. Here is the scheme, based on our 3 technology. This was filed to Tampa. And the 4 jury has to decide as to whether we Americans can 5 tolerate interference by Frank Israel, Pepijn van 6 Erp, and the friends in the United States and 7 accomplices in the United States. Or is it the 8 time that we defend ourselves a little bit better? 9 Third, I want this to be on file. This is 10 another application also dismissed by the 11 Air Force. And I would have -- in due time I will 12 prove, at least to a degree of sufficient 13 plausibility, that this additional grant 14 application for military -- I'm talking about the 15 military. I can now disclose this Netron gun 16 because it's been rejected. It's public 17 knowledge. I am the CEO of a public company. I 18 must disclose things to the public. So I'm very 19 proud to say I did my best. It's now up to the 20 court to defend me in my fight for the United 21 States of America. 22 This is a third application, also rejected 23 because of the horrendous accusations, slander, 24 and the defamating statement totally unprovoked. 25 I didn't even know the existence of Frank Israel</p>	<p>Page 16</p> <p>1 Okay. So here is the point. This 2 fundamental advancement in the power of our -- it 3 was rejected because people have attacked it in an 4 extremely violent, vulgar, vicious way, the notion 5 of magneucle. Why? If you want to object, object 6 to the technical layout in referee journals, but 7 not publicly. They did it publicly intentionally 8 to prevent -- prevent advance in our military. 9 This is what the literature -- this is what 10 the jury will have to understand; namely, that 11 this has been an attack to our national security 12 by foreigners, total foreigners, people that have 13 interfered in such a vulgar, vicious, completely 14 unmotivated -- Mr. van Erp attacked so 15 violently -- sorry if I'm -- again, I'll speak 16 slowly, but please tell me if -- 17 THE REPORTER: Thank you. 18 THE WITNESS: Attacked so violently, but 19 there is no technical argument whatsoever. Only 20 vulgar terms, fraud. 21 Ladies and gentlemen, that's why my wife and 22 I, we prove -- I have to say my wife, Carla 23 Santilli, and I, we are bewildered -- we prove our 24 guts as an American to initiate this lawsuit so 25 that people in America can start to wake up of</p>
<p>Page 15</p> <p>1 before my wife brought it to my attention. I 2 didn't know the existence of van Erp and their 3 friends from all over the world. They brought 4 me -- I've been wrongly attacked so much when -- 5 from Frank Israel. 6 Anyhow, this is also for a number of 7 additional -- a number of additional -- additional 8 military applications, including what the Russians 9 and the Chinese are doing, namely, developing. 10 See, until now -- what you have to understand is 11 that until now, we in America, we have pushed the 12 power of the engine -- power of the engine in our 13 jet fighter. Power of the engine. 14 Gentlemen, this is the technology of the last 15 century called millennium. Now the frontier is 16 improved power of the fuel. By what? The 17 MagneGas. And with all the proof that we have, 18 proof from the City College of New York, that 19 Scott Tadsen has presented very, very -- in this 20 extremely important document that will be titled, 21 Mr. Lake, as -- sorry. I apologize. Attorney 22 Lake. It will be filed as a notice. And you are 23 very welcome to object. We would be very happy if 24 you object, because that's exactly what we're 25 looking for.</p>	<p>Page 17</p> <p>1 what's going on against us. 2 I conclude my statement with -- I conclude my 3 opening statement with the following statement. I 4 have made it several times as a scientist all over 5 the world, including scientific -- I had been 6 invited a few months ago to a major scientific 7 conference in China. In Russia I have been 8 invited. I have been invited by Gorbachev. I had 9 an interview for 25 minutes with Gorbachev. They 10 are developing those technologies that in America 11 is no longer possible because of the interference, 12 because in Russia they are -- this does not exist 13 in China. They laugh at the idea of organized 14 interest of Einstein. They just laugh at it. 15 They do the research. They do the research. 16 So I want to conclude -- incidentally, one of 17 the -- one of the reasons for all this is 18 systematic, is that all this new technology are -- 19 they're called Beyond Einstein. And everything I 20 work -- I work to broaden Einstein theories, not 21 for the condition started by Einstein, which are 22 point particles in the electromagnetic waves 23 moving in a vacuum. Those are conditional in 24 which the Einstein theory are sacred. I'm a 25 strong supporter of Einstein.</p>

<p>Page 18</p> <p>1 Now, my work has been to surpass the theory 2 for a condition unthinkable during Einstein, 3 namely, for a point larger. See, Einstein 4 necessarily requires the representation of 5 particles being points. Mr. Scott Tadsen has 6 expressed this view beautifully. 7 Now, this is the past millennium now, the 8 past century. We have to start -- we need new 9 energy. We have to start with the neutron. 10 They're in the nucleus so going to -- 11 THE REPORTER: I need you to slow down a 12 little bit. 13 THE WITNESS: Thank you. I appreciate it. 14 So the condition started by Einstein, his 15 theory, my God, it's enough to see accelerated 16 particles, proving every day this theory about it, 17 so there's no point in even discussing it. 18 But when you -- but the requirement, 19 necessarily, is the representation of a particle 20 and point of light. So this is okay for the 21 electron around -- orbiting around the nucleus of 22 an hydrogen atom. But when you're talking about a 23 proton and Netron in a nucleus, no, this Einstein 24 theory cannot be claimed to be violated. That 25 would be unethical for Einstein. Einstein is not</p>	<p>Page 20</p> <p>1 with no second, to my knowledge. But -- but -- 2 however, the biggest enemy of the United States of 3 America are in America and carries American 4 passports. 5 BY MR. LAKE: 6 Q. Dr. Santilli, may I ask you some questions 7 about the documents? 8 A. Of course. 9 Q. Thank you. 10 A. Go ahead. 11 Q. Thank you very much. The court reporter, 12 Aaron, is going to mark some of these exhibits. May we 13 use these copies? 14 A. Absolutely, yes. 15 Q. Thank you very much. 16 A. Here it is. 17 Q. Thank you. 18 A. They are at your disposal. 19 Q. Thank you very much. 20 If you don't mind, what I'd like to do -- 21 (Brief discussion off the record.) 22 BY MR. LAKE: 23 Q. Dr. Santilli, if you don't mind, so that I 24 can keep the different exhibits straight, what I would 25 like to do is take the -- mark each of these as an --</p>
<p>Page 19</p> <p>1 applicable. It's not an applicable representation 2 of proton and Netron as extended particles. 3 And so you require, first of all, the 4 mathematics that I started at Harvard on the 5 support precisely to broaden the mathematics used 6 by Einstein theories, permitting for the first 7 time in history the representation of protons and 8 neutrons as extenders. And then once you have 9 made the extra [inaudible], you have new 10 interaction and other implications. 11 But the point is this: All those theories 12 are against the organized interest by Frank Israel 13 and his groups, because -- besides, I'm not a 14 member of the group, which makes it -- otherwise, 15 I would be -- I would have received a couple of 16 Nobel prize so far. I'm dreaming, of course. But 17 they will push me in any case. 18 So the conclusion is this, that I stated it 19 in a number of International Congresses as a 20 keynote speaker. I have been a keynote speaker. 21 I have been a keynote in many congresses, 22 including the last one in China, Russia, and so 23 many other countries I don't remember. 24 My statement is this, that America is -- that 25 our country is the strongest country in the world</p>	<p>Page 21</p> <p>1 A. As an exhibit? 2 Q. -- exhibit, yes, if that's all right with 3 you. 4 A. Absolutely. I can do it in blue. 5 Q. No, no. Aaron has, hopefully, has provided 6 stickers. 7 A. Okay. Can I -- 8 Q. So -- 9 A. Am I allowed to help you in the sequence, 10 because the sequence is very important? 11 Q. Okay. 12 A. I insist in certain sequence. 13 Q. Of course. 14 A. Because some of the important things can be 15 hidden against the interest of the United States of 16 America to serve foreign interests. 17 Okay. This is on the record now. With your 18 approval, Exhibit 1. 19 Q. Okay. This will actually be marked Exhibit 20 V30, because we've already numbered some exhibits from 21 last week. 22 A. Very well. 23 Q. Okay. 24 (Exhibit V30 was marked for identification.) 25 THE WITNESS: This is the No. 2.</p>

<p>Page 22</p> <p>1 BY MR. LAKE: 2 Q. Very good. That will be V31. 3 A. Perfectly okay. 4 (Exhibit V31 was marked for identification.) 5 THE WITNESS: This is No. 3. By my count, 6 No. 3. 7 MR. LAKE: Yes. This will be V32. 8 (Exhibit V32 was marked for identification.) 9 THE WITNESS: Number 4. 10 BY MR. LAKE: 11 Q. Okay. 12 A. I'm sorry. No, no. This is the 10-K. 13 Q. I was thinking the Institute biography might 14 go next. 15 A. My -- my biography, yes. 16 Q. Yes. 17 A. Number 4. 18 (Exhibit V33 was marked for identification.) 19 BY MR. LAKE: 20 Q. And, actually, let's pause there for a 21 second. If you don't mind, I'd like to ask you a 22 couple questions about the biography. 23 A. Any question. 24 Q. Thank you. V33, this -- 25 A. Can we finish the sequence and then ask</p>	<p>Page 24</p> <p>1 Technologies." 2 A. That is correct. 3 (Exhibit V35 was marked for identification.) 4 BY MR. LAKE: 5 Q. Okay. 6 A. And then the next one for DARPA and the 7 division for new weapons for the United States of 8 America. 9 Q. "Proposal to Develop the New Neutron Gun"? 10 A. Yes. 11 Q. That's V36. 12 (Exhibit V36 was marked for identification.) 13 THE WITNESS: That's been rejected. 14 BY MR. LAKE: 15 Q. Okay. 16 A. And this, finally, for a variety of military, 17 presumably expected to be secret, application -- 18 military application of our technologies, particularly 19 the improvement of the power of our jets by the 20 enhancement of the energy of the fuel via Santilli 21 magnecules, as they are internationally accepted -- 22 Q. Okay. 23 A. -- and recognized. 24 Q. So V3- -- 25 MS. CARLA SANTILLI: The patent as well.</p>
<p>Page 23</p> <p>1 questions? 2 Q. Okay. Sure. 3 A. Let's finish it -- 4 Q. Okay. 5 A. -- or we'll lose the count. What count was 6 that? 7 Q. That's V33, is your biography. 8 A. Okay. And then comes this one. 9 Q. V34 is the 10-K for Thunder Energies for the 10 year ended December 31st, 2017. 11 (Exhibit V34 was marked for identification.) 12 THE WITNESS: And this is very important in 13 that sequence. Those are the military 14 applications -- 15 BY MR. LAKE: 16 Q. Okay. 17 A. -- that are now public knowledge. 18 Q. Thank you. V35 is -- 19 A. Incidentally -- sorry to interrupt. They 20 were, of course, presented with extreme secrecy to our 21 military. 22 Q. Okay. 23 A. And -- 24 Q. V35 is, "New Initiatives for Nuclear 25 Detection and Monitoring and Verification</p>	<p>Page 25</p> <p>1 THE WITNESS: The patent. Also, the United 2 States -- thank you, Carla -- the United States of 3 America has granted me an official patent on the 4 magnecule -- 5 BY MR. LAKE: 6 Q. Okay. 7 A. -- that your friends -- I don't call them 8 customers or a client. They have attacked so 9 violently. For what reason? What's their gain? The 10 jury has to identify why, what's the gain to be so 11 violent against America? 12 Q. So V37 is a document titled, OMB Number: 13 4040-0010 from Thunder Energies. 14 Is this a grant application? 15 A. Yes, indeed. 16 (Exhibit V37 was marked for identification.) 17 BY MR. LAKE: 18 Q. Okay. 19 A. Very, very secret -- 20 Q. All right. 21 A. -- when it was filed. 22 Q. Let me ask you -- 23 A. Rejected. Public knowledge -- 24 Q. Okay. 25 A. I'm a public company. I have a duty.</p>

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1 Q. Okay.
2 A. I want to clarify a second time that I have a
3 duty as CEO of a public company to disclose to the
4 public --
5 Q. Okay.
6 A. -- against my will. I would prefer to keep
7 this -- but, again, I have information that the Russian
8 and Chinese --
9 Q. Okay.
10 A. -- are doing that. So at least the American
11 people should know what's going on.
12 Q. Now, Dr. Santilli, I have allowed you to make
13 your opening statement. I would like to move through
14 some questions now.
15 A. I'm at your disposal.
16 Q. Thank you very much.
17 And, again, if there is something that occurs
18 to you you'd like to say in addition to your answer,
19 you will have the opportunity to do that. But I do
20 need to go ahead and move into the questions.
21 A. Please proceed.
22 Q. And the first ones were about your biography,
23 so this is very helpful.
24 A. Go ahead.
25 Q. We marked V33, your biography from the

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1 Institute for Basic Research website, correct?
2 A. That is correct. Now, the IBR is --
3 Q. Yes.
4 A. Yeah, that is correct. I call it the IBR,
5 the Institute for Basic Research, yes.
6 Q. And this document lists a number of academic
7 and industrial affiliations you have, correct?
8 A. In the past and not necessarily now, but the
9 answer is yes.
10 Q. Over the years, yes.
11 A. Over the years, yes.
12 Q. And the number of -- the word here is
13 monographs. These are books you have written, correct?
14 You've written a number of books?
15 A. Scientifically they're called monographs.
16 Q. Yeah.
17 A. About 20 of them, post -- all of them
18 post-Ph.D.
19 Q. Okay.
20 A. Your friends, the defendants, are illiterate,
21 because they have no technical knowledge. Van Erp --
22 and I want to be on the record. Van Erp has not even
23 completed his --
24 Q. Again, Dr. Santilli, if you could just answer
25 the questions at this point. If there are things you

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1 want to add --
2 A. I apologize.
3 Q. -- you'll have the opportunity to --
4 A. I apologize. You are correct in this case.
5 Q. Okay. And then Exhibit V33 also lists
6 numerous papers --
7 A. Three hundred --
8 Q. -- shorter articles.
9 A. Three hundred-plus. 300-plus papers.
10 Q. Okay. Thank you very much.
11 A. Thank you for those questions.
12 Q. Of course.
13 A. You are very welcome.
14 Q. Let me then ask you about a different
15 Thunder Energies document. I believe you've seen this
16 before. Let me ask you if you recognize it.
17 Well, let's let Aaron mark that first. I'm
18 sorry.
19 A. Please proceed.
20 (Exhibit V38 was marked for identification.)
21 BY MR. LAKE:
22 Q. Dr. Santilli, I'm going to hand you a
23 document we've --
24 A. Thank you.
25 Q. -- marked Exhibit V38.

Page 29

1 A. I need help to identify it.
2 Q. Okay.
3 A. Would you please help me to identify what
4 this document is?
5 MS. CARLA SANTILLI: Thunder Energies
6 Corporation announces 750,000 views on YouTube
7 between 1/19 and 2/9 for BTV breaking news on the
8 discovery of invisible, da, da, da. Of course, we
9 know that, yes.
10 THE WITNESS: It's not an official statement
11 of the company.
12 BY MR. LAKE:
13 Q. Okay. So this is -- you can -- if you would
14 keep that, I have a copy.
15 MS. CARLA SANTILLI: Yeah.
16 BY MR. LAKE:
17 Q. I'm going to ask you some questions about it.
18 A. Go ahead.
19 Q. Actually, Dr. Santilli --
20 MR. LAKE: Mrs. Santilli, I appreciate your
21 help. But at this point in the process, I need to
22 ask him questions.
23 MS. CARLA SANTILLI: No, I understand. But
24 because he doesn't see well --
25 THE WITNESS: At my age -- at my age I have

<p>Page 30</p> <p>1 problem reading. 2 BY MR. LAKE: 3 Q. Okay. 4 A. So I need help. 5 Q. I understand. Thank you very much. Okay. 6 A. I'm 83 years old, for the record. 7 Q. Thank you very much. 8 So this document is correct in saying your 9 video announcing the discovery -- the breaking news of 10 the discovery of invisible terrestrial entities had 11 750,000 views in just a few weeks after it was 12 launched, correct? 13 A. I believe -- I believe -- this is not a 14 record of our company. The interview was listed in the 15 website, to my recollection, of Business Television, 16 which is a highly professional talk show in Canada. 17 And the hits were on their website, not on MagneGas. 18 Q. Okay. I understand. 19 A. And they claim 750 in ten days. It reached, 20 eventually, a million and a half. 21 Q. But you put that number on 22 Thunder Energies' -- 23 A. Because it was released -- 24 Q. -- document, right? 25 A. -- in writing by Business Television.</p>	<p>Page 32</p> <p>1 I would like to read the subtitle, because they 2 are not -- the subtitle, it doesn't read -- 3 THE WITNESS: I cannot tell -- 4 MRS. CARLA SANTILLI: The first one -- 5 [inaudible]. 6 THE REPORTER: Can we go off the record for a 7 minute, please? 8 MR. LAKE: Sure. 9 MRS. CARLA SANTILLI: The first one -- 10 MR. LAKE: I'm sorry. 11 THE VIDEOGRAPHER: It's 10:26 a.m. We are 12 off the record. 13 (A recess was taken.) 14 THE VIDEOGRAPHER: It's 10:28 a.m. We are on 15 the record. 16 BY MR. LAKE: 17 Q. Dr. Santilli, you've taken a moment to look 18 at this list of videos, and I know you want to say 19 something about it. Go ahead. 20 A. Number 1, yes, I have been in a number of 21 videos. But I cannot say that those are the videos 22 until I see personally. However, from the title that I 23 heard, one of them, it says, "Einstein was wrong." I 24 have been one of the strongest supporters of Albert 25 Einstein. I always indicated that Einstein is a great</p>
<p>Page 31</p> <p>1 Q. Very good. 2 So you believe that to be true, as far as you 3 know? 4 A. I have not filed a lawsuit against -- to get 5 evidence from them, probably not. 6 Q. Okay. 7 A. This is -- those are doubts that they may be 8 easily constructed as being potentially vicious. 9 Q. Okay. The breaking news video is not your 10 only Internet video, correct? You've appeared in 11 others? 12 A. That is correct, yes -- 13 Q. Okay. 14 A. -- with great pleasure. 15 Q. Okay. 16 A. Yes. 17 MR. LAKE: This will be V39, then. 18 (Exhibit V39 was marked for identification.) 19 BY MR. LAKE: 20 Q. If you would take a look at this document, 21 Dr. Santilli. Does that appear to be a list of videos 22 in which you've appeared discussing you or your 23 discoveries? 24 A. They look like it, yes. 25 MRS. CARLA SANTILLI: Just a moment. Okay.</p>	<p>Page 33</p> <p>1 scientist. Everything that he stated proved to be true 2 under the condition stated by Einstein. So, 3 positively, I'm not the author of a video stating that 4 Einstein was wrong. If you look in all my scientific 5 papers, I always make the point, under those new 6 conditions, Einstein is inapplicable -- 7 Q. Okay. 8 A. -- but not violated, so -- 9 Q. Thank you. 10 A. You're welcome. 11 Q. Let me ask you a question about the last 12 Exhibit, V38, on Thunder Energies' letterhead. 13 Do you still have that? 14 A. This one? 15 Q. Yes, that one there. 16 A. Please. 17 Q. If you would refer to the second page -- 18 well, they're copied front and back to save paper. 19 Does this appear to be, beginning on the 20 second page, Dr. Santilli, a list of links to the 21 Thunder Energies' video? And, specifically, the video 22 about invisible terrestrial entities. 23 MS. CARLA SANTILLI: [Speaking Spanish]. 24 THE REPORTER: I can't understand. I'm 25 sorry.</p>

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1 MRS. CARLA SANTILLI: This is Spanish.
 2 THE WITNESS: It's Spanish.
 3 MRS. CARLA SANTILLI: But absolutely not.
 4 MR. LAKE: Okay.
 5 MRS. CARLA SANTILLI: Telescope detected in
 6 Spanish, not at all. "Face like the sun," so
 7 what, not at all.
 8 THE WITNESS: I do not remember the --
 9 MRS. CARLA SANTILLI: Yeah. None of these --
 10 MR. LAKE: I'm sorry, Mrs. Santilli, we need
 11 to ask Dr. Santilli the questions now.
 12 MRS. CARLA SANTILLI: Well, I know, you know.
 13 If he cannot read that, you know --
 14 MR. LAKE: If --
 15 MRS. CARLA SANTILLI: I mean, this is like --
 16 these are --
 17 THE WITNESS: Carla.
 18 This seems to be a list of -- a list of -- a
 19 list of video topics and discussions all over the
 20 world of -- but definitely not in -- it's not
 21 something related at all unless they have been
 22 authorized by Thunder Energies Corporation.
 23 BY MR. LAKE:
 24 Q. Okay. Do you know why Thunder Energies
 25 compiled that list? It is on Thunder Energies'

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1 letterhead, correct?
 2 A. I have to call -- I have to consult -- I have
 3 to consult -- it might have been for Business
 4 Television --
 5 Q. Okay.
 6 A. -- for Canada maybe, maybe for other --
 7 Q. Who compiled that list, if you know?
 8 A. I have no idea.
 9 Q. Does Thunder Energies have any employees
 10 other than the two of you?
 11 A. Well, we use a number -- a number of
 12 consultants outside. We don't have the money to have
 13 employees.
 14 Q. Did you have a consultant who worked on that
 15 announcement?
 16 A. We have a number of consultants, including
 17 consultants sent by Business Television. They sent --
 18 they came with a crew, a television crew. But they
 19 come here and stay there, and then they disappear.
 20 Q. Okay.
 21 A. Very likely they may have -- in any case, I
 22 believe it's irrelevant who compiled this list.
 23 Q. Okay.
 24 A. This is a list of --
 25 Q. Dr. Santilli, you've answered my question.

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1 Thank you. And I appreciate it.
 2 A. You're welcome.
 3 Q. You also are the subject of a biography on
 4 LinkedIn, correct? You have a LinkedIn biography?
 5 A. I have never read it.
 6 MR. LAKE: Okay. Let's mark this V40,
 7 please.
 8 (Exhibit V40 was marked for identification.)
 9 BY MR. PARRISH:
 10 Q. Dr. Santilli, does that appear to be a
 11 biography of you on the LinkedIn --
 12 A. I have to read it -- to read it to --
 13 Q. -- website? Please.
 14 A. Then I have to ask my wife to read it,
 15 please.
 16 Carla, could you please --
 17 MR. PARRISH: She's reading it.
 18 MRS. CARLA SANTILLI: I'm reading it. I'm
 19 trying to understand.
 20 THE WITNESS: Please read it.
 21 MRS. CARLA SANTILLI: I'm reading silently
 22 just to understand. This -- so there is
 23 a [inaudible] -- is from -- some of this is put
 24 out by Google search, Google scholars. I don't
 25 know.

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1 MR. LAKE: Okay. All right.
 2 MRS. CARLA SANTILLI: I never saw any of
 3 these.
 4 THE WITNESS: I've never read it.
 5 BY MR. PARRISH:
 6 Q. That's fine. If you don't recognize the
 7 document, you don't recognize it.
 8 A. No, I've never read it.
 9 Q. No problem. Thank you very much.
 10 And a collection of your books on an author
 11 page on Amazon.
 12 A. I'm sorry, could you repeat that?
 13 Q. Is there a collection of your books available
 14 on an author page on the Amazon website?
 15 A. I don't know. I don't have time to do that.
 16 MR. LAKE: Okay. Let's mark this V41,
 17 please.
 18 (Exhibit V41 was marked for identification.)
 19 BY MR. LAKE:
 20 Q. Are your -- are books you've written
 21 available on Amazon?
 22 A. I don't know.
 23 Q. Okay.
 24 A. Maybe yes, maybe no.
 25 Q. Okay. Let me ask you if you recognize V41,

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1 please.

2 MRS. CARLA SANTILLI: Yeah, these are all --

3 THE WITNESS: Yeah. Those are the front
4 pages of my books, yes.

5 BY MR. LAKE:

6 Q. Okay.

7 A. Incidentally, all my books are available in
8 free PDF download and in -- free PDF download, the
9 entire books from the archives of the Santilli
10 Foundation.

11 Q. Okay.

12 A. So they can be read without buying -- without
13 necessarily buying them. However, a number of
14 scientists, they prefer to have the actual book for
15 their own library, because some of those books are
16 currently -- they start at \$50, and now they're sold,
17 I'm told, hundreds of dollars. They are acquiring
18 value with the passing of time and with the interest
19 created in the scientific community of this lawsuit,
20 which my wife and I had the courage to file.

21 MRS. CARLA SANTILLI: Okay. I think that is
22 yours.

23 MR. LAKE: Let's mark that V42.

24 (Exhibit V42 was marked for identification.)

25 BY MR. LAKE:

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1 Q. Thank you very much.

2 A. Well, I have to clarify, however. There
3 were --

4 MRS. CARLA SANTILLI: That was not -- that
5 was not written by you.

6 THE WITNESS: Attorney Parrish, I need to
7 return on this.

8 MR. PARRISH: Yes.

9 THE WITNESS: It will not remain just like
10 that.

11 MR. PARRISH: Yes.

12 THE WITNESS: For instance, I intend to
13 ask -- Attorney Parrish, I intend to ask that this
14 document be put on file in which there's a picture
15 of when I received the award in the presence of
16 the three organizers. I repeat, this is a picture
17 of the moment in which I received the award during
18 the banquet in the presence of the three
19 organizers. I request that this -- that the
20 document be put on file.

21 BY MR. LAKE:

22 Q. Okay.

23 A. Attorney Lake, I have not heard your
24 acceptance.

25 Q. I have no objection. We can mark that as the

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1 Q. Dr. Santilli, if you would look at Document
2 V42, please, which has just been handed to you.

3 A. Yes.

4 Q. Yes.

5 A. Yes, I do.

6 Q. Okay. That's a copy of an award that you
7 received, correct?

8 A. That is correct, indeed.

9 Q. Okay. And do you have -- do you have the
10 original?

11 MRS. CARLA SANTILLI: Yes, we do.

12 THE WITNESS: Yes, yes.

13 BY MR. LAKE:

14 Q. Good. Thank you very much. I was going to
15 ask for it.

16 All right. Tell me, if you would, if the
17 conference organizers asked to remove the American
18 Institute of Physics from the award.

19 A. That is correct.

20 Q. Okay.

21 A. Because -- I have to clarify.

22 Q. I'm sorry, Dr. Santilli. You've answered my
23 question. If you want to speak more, Mr. Parrish will
24 give you the opportunity to do that. Okay?

25 A. Okay.

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1 next exhibit, sure.

2 A. Okay. So the idea that I faked this prize in
3 the presence of the organizers, it is very vicious to
4 say it, very, very.

5 Q. Let's mark the photograph V43.

6 A. Okay.

7 Q. And I don't want to mark your original. You
8 said that's the original, correct?

9 A. The original is here.

10 Q. Yeah. Okay.

11 A. This is the copy. You can mark the copy, if
12 you want.

13 Q. That's all right. We have -- we have the
14 copy that's in front of you already marked.

15 A. Okay.

16 MR. LAKE: So let's mark that -- is that V43?

17 THE REPORTER: Yes.

18 (Exhibit V43 was marked for identification.)

19 THE WITNESS: I will ask why the American
20 Institute of Physics requested the removal of the
21 name of "American Institute," not the removal of
22 the title. The American Institute of Physics did
23 not request annulment of the title.

24 BY MR. LAKE:

25 Q. So your understanding, Dr. Santilli, is that

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1 the organization did -- or the editor did -- agreed to
2 remove AIP as a sponsor from the conference website and
3 removed from the certificate; that's correct?

4 MRS. CARLA SANTILLI: No.

5 THE WITNESS: No. But they -- they denied.

6 BY MR. LAKE:

7 Q. Okay.

8 A. They denied because -- because the American
9 Institute was, indeed, a sponsor. And they denied it
10 for the following written counts.

11 Count No. 1, they could not dismiss that the
12 American Institute was not a sponsor -- that the
13 American Institute of Physics was not a sponsor of
14 their prize. American Institute was a sponsor of the
15 meeting --

16 Q. Okay. So it has to be --

17 A. -- number 1. Number 2 --

18 Q. -- removed from the certificate?

19 A. They request -- the American Institute of
20 Physics, following pressure by van Erp and Frank
21 Israel, admitted in their own -- admitted in their own
22 deposition. Following pressure, the American Institute
23 of Physics requested it. The organizers strongly
24 objected and confirmed in writing -- in writing, the
25 prize, so that's why I kept the prize. Otherwise, I

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1 articles published, right?

2 A. But after hundreds of publications --

3 Q. Okay.

4 A. -- the American Physical Society --

5 Q. Dr. Santilli, please. The American Journal
6 of Modern Physics has published --

7 A. Is one of the minor journal --

8 Q. Okay.

9 A. -- out of many other articles that I've
10 published.

11 Q. Would you say about eight, ten articles by
12 you in that journal?

13 A. I don't know the count.

14 Q. Okay.

15 A. A few articles. After 320 --

16 Q. Okay.

17 A. -- I have published -- I don't know -- five
18 or three percent, five percent. It's a very small
19 number out of hundreds of articles. And I will not
20 accept and respect the author on that journal, on that
21 journal only, while ignoring -- while ignoring primary
22 journals, American Physics -- the Journal of American
23 Physical Society, [inaudible], the Institute of Physics
24 in England, and the Russian Academy of Science. I have
25 a number of papers in Russia, etc., etc.

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1 would -- I don't need the prize. I have so many. I
2 would need another wall I have so many. I would have
3 removed it.

4 And the way the American Institute of Physics
5 achieved their objective is they threatened the
6 organizer that the American Institute of Physics would
7 not publish in the future the proceedings of that
8 series of meetings in the event they did not comply.

9 Q. Okay.

10 A. Those people had the courage to withstand
11 such an attack. And this is one of the cases that
12 eventually is in front -- we deal with in front of the
13 jury --

14 Q. Okay.

15 A. -- for the American people to see how
16 foreigners -- foreigners attack -- attack our -- our
17 research of direct national relevance.

18 Q. Let me move on to another subject. Thank
19 you.

20 A. Go ahead.

21 Q. The American --

22 A. Here you are.

23 Q. Thank you.

24 The American Journal of Modern Physics,
25 that's a journal in which you had a number of your

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1 Q. Your biography that we've already marked V33,
2 you would agree that the American Journal of Modern
3 Physics articles listed here are, in fact, articles you
4 had published there, correct?

5 A. That is correct.

6 Q. Okay.

7 A. However --

8 Q. That's my only question.

9 A. However --

10 Q. Dr. Santilli, please, that's my only question
11 on that subject. Again, we can -- you can respond
12 later if you need to add things.

13 You paid to have those articles published?

14 A. Most of them journals, except our journal.
15 Our journal is a free publication.

16 Q. But you paid the American Journal of Modern
17 Physics?

18 A. Most of the -- most of them, yes.

19 Q. Okay.

20 A. Most of the journals, indeed. The American
21 Physical Society charges thousands of dollars.

22 Q. Okay.

23 A. Yes, this is very routine.

24 Q. So you agree that the Science Publishing
25 Group that owns the American Journal of Modern Physics

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1 charges article process -- article processing charges?

2 A. Yes. This is public knowledge in any case.

3 Q. Okay.

4 A. How can I possibly deny?

5 Q. Okay.

6 A. But it is for all journals and not only for
7 that journal.

8 (Exhibit V44 was marked for identification.)

9 BY MR. LAKE:

10 Q. Dr. Santilli, let me show you a document
11 we've marked V44. I believe that's one of your
12 articles in the American Journal of Modern Physics,
13 correct?

14 A. If it carries my name, if it's my name, it
15 is. Yes, it is my article.

16 Q. Okay. You can keep that copy.

17 A. Thank you.

18 Q. I've got that one. Thank you.

19 Just a couple questions about this. You
20 mentioned earlier that this journal typically charges
21 for publication. You paid them for this article, in
22 particular, to be published in that journal, correct?

23 A. All journals -- my answer is that all
24 journals, with extremely few exceptions, require --
25 require publication charges, so it's not an exception.

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1 "Received December 24th, accepted
2 December 25th, published June 8, 2016."

3 THE WITNESS: That's enough. Thank you,
4 Carla.

5 MRS. CARLA SANTILLI: Okay.

6 THE WITNESS: Yes. What's wrong with that?

7 BY MR. LAKE:

8 Q. I'm not saying there is anything wrong. I'm
9 just trying to get information.

10 MRS. CARLA SANTILLI: Yeah.

11 BY MR. LAKE:

12 Q. So your recollection is consistent with this,
13 that the article was received on December 24th and
14 accepted the 25th?

15 A. That, I do not know. The only thing I
16 know --

17 Q. Okay.

18 A. -- is this is in China. The office is in
19 Hong Kong.

20 Q. Okay.

21 A. In China they totally ignore Christmas. They
22 are Buddhist or otherwise. So for them, December 25th
23 is a routine working day.

24 Q. Okay.

25 A. So there is nothing wrong with it whatsoever.

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1 Q. Okay. Thank you.

2 A. It's a routine.

3 Q. Okay.

4 A. Actually, the publication charges of the
5 American Journal is a fraction --

6 Q. Okay.

7 A. -- of the publication charges of the American
8 Physical Society. I'm talking about a few hundred
9 versus a few thousands of dollars.

10 Q. Okay.

11 A. So it's a journal with very small publication
12 charges.

13 Q. Let me point you --

14 A. Sure.

15 Q. -- to a particular line here.

16 A. Please, please, anything.

17 Q. This -- can you read the line that says
18 "received" and then the date when the article was
19 received and when --

20 A. Sure.

21 Q. -- it was accepted?

22 A. Sure.

23 THE WITNESS: Can you read it? Just read it
24 for me, Carla, no comments. Read it, please.

25 MRS. CARLA SANTILLI: I'm laughing.

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1 Q. Okay. Thank you very much.

2 Have you heard that the American Journal of
3 Modern Physics publisher, that is, Scientist Publishing
4 Group, has been called a predatory journal?

5 A. Yes, I have.

6 Q. What does that mean, a predatory journal?

7 A. A predatory journal means a journal that,
8 essentially, performs like what Frank Israel and van
9 Erp are doing against me, essentially the same thing.
10 They publish theories that are not accepted by the
11 organizer of interest at the center and, in this case,
12 represented by Frank Israel and his group.

13 Q. Okay.

14 A. And so, therefore, Frank Israel, they are
15 called -- not only Frank Israel, but many other members
16 of his group, they call the American Journal of Physics
17 predatory because they publish new things beyond
18 Einstein's theory for the pursuit of the normal
19 scientific process of trial and error in moving forward
20 in human knowledge. They strongly oppose.

21 Q. Okay. And so let me show you another
22 exhibit, then, and ask you if this is typical of what
23 you're talking about, the criticism of the Science
24 Publishing Group as a predatory journal.

25 A. Okay. I have to clarify. Let me see it.

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1 Attorney Parrish, this is very dangerous. I start to
2 be getting a little bit tense, because the word
3 "predatory journal" was listed by a guy. His name is
4 Beall.

5 MRS. CARLA SANTILLI: It's Beall's.

6 THE WITNESS: Beall's, B-a-e-l-s [sic].

7 MRS. CARLA SANTILLI: L-l-s.

8 THE WITNESS: List.

9 BY MR. LAKE:

10 Q. Dr. Santilli, please, if you --

11 MRS. CARLA SANTILLI: No.

12 BY MR. LAKE:

13 Q. If you could just answer the question and --

14 A. I cannot --

15 MRS. CARLA SANTILLI: No, this is --

16 THE WITNESS: Attorney Parrish with --

17 MR. LAKE: And --

18 MR. PARRISH: Hold on a second.

19 THE WITNESS: Attorney Parrish, if I cannot
20 clarify, this is -- I feel I'm being framed. I
21 have to clarify who stated "predatory journal."

22 MR. PARRISH: Okay.

23 THE WITNESS: I feel entrapped.

24 MR. PARRISH: I understand.

25 THE WITNESS: And then this meeting has to

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1 Q. Will you -- will you allow me to explain,
2 though, what I'm trying to do? I'm just trying to get
3 an answer from you to the question.

4 A. That's wrong. But this is entrapment.

5 Q. Dr. Santilli --

6 A. If you cut the clarification, it's an
7 entrapment. It's not the due process, in my -- it's
8 not a process, a legal process that I consider in the
9 compliance with the ethical rule of the United States
10 bar association. That's my opinion. You are violating
11 that rule. That's why I'm, as I already stated many
12 times to Attorney Parrish, I'm anxious to go in front
13 of the judge.

14 Q. Dr. Santilli --

15 A. I'm only asking to clarify in 30 seconds --

16 Q. Okay.

17 A. -- who stated this predatory journal.

18 Q. Sure.

19 A. And that is a legitimate question. That's
20 why we need the judge to intervene.

21 Q. Please go ahead.

22 A. Okay. I remain. But we just -- a few
23 seconds I will --

24 Q. Please.

25 A. In a few seconds I would have gone. With

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1 stop, and we go to the judge.

2 MR. PARRISH: Well, let me ask you this: If
3 I can ask you the question to allow you to clarify
4 later --

5 THE WITNESS: Please ask it now, because it
6 has to be connected directly to the paper. If put
7 it later, in the meantime, the emphasis is I
8 published in a predatory journal. That's very
9 demeaning. That's vicious against me. So I
10 request the clarification now; otherwise, I leave.
11 Gentlemen, the decision is yours.

12 MR. PARRISH: Ruggero -- or, Dr. Santilli,
13 it's up to you. But if you --

14 THE WITNESS: Why -- why --

15 MR. PARRISH: It's up to you how you want to
16 deal with this.

17 THE WITNESS: Why does Mr. Lake -- does not
18 allow me to -- because he knows that it's
19 against -- against the evidence here.

20 BY MR. LAKE:

21 Q. Dr. Santilli, I'm not trying to cut you off.
22 We're just trying to proceed and --

23 A. Then allow me to state and to clarify the --
24 allow me to clarify that this predatory journal.
25 That's all.

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1 extreme anxiousness I would go to the judge.

2 The statement "predatory journal" -- please,
3 this is very important to be on the record, if I'm --
4 the statement "predatory journal" was filed by a member
5 and a friend of Frank Israel called the Beall's -- the
6 so-called Beall's list.

7 MRS. CARLA SANTILLI: Beall's list.

8 BY MR. LAKE:

9 Q. That's B-e-a-l-l --

10 A. B-e-a-l- --

11 Q. -- right?

12 MRS. CARLA SANTILLI: Exactly.

13 THE WITNESS: Beall's list.

14 And this list -- in -- in this list, not only
15 the American Journal of Modern Physics, but a list
16 of all journals that they have liberal, liberal
17 policies; namely, the policy of permitting the
18 publication of the pursuit of new knowledge, of
19 new scientific knowledge, which is the historical
20 process of trial and error.

21 Now, here is the point that must be on the
22 record. Beall -- the quotation of Beall's list is
23 very, very vicious. Why so? Because that Beall
24 list was terminated years and years ago.

25 MRS. CARLA SANTILLI: No, no.

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1 THE WITNESS: No.

2 MR. LAKE: I'm sorry, Dr. Santilli, you need
3 to answer the questions. Mrs. Santilli, we'll
4 depose you this afternoon.

5 THE WITNESS: Carla. If I make a mistake,
6 Carla -- it was terminated -- was terminated by
7 Beall himself because of threatened lawsuit by a
8 number of journals.

9 BY MR. LAKE:

10 Q. Okay.

11 A. One of them was precisely the Chinese group,
12 threatened this guy with an extremely dishonest sort of
13 quotation. I'm using and building on a lawsuit in
14 which we are trying to defend the interest and we're
15 fighting and spending our life and millions of dollars
16 in defending the interest of the United States.
17 Quoting that Beall's list is in violation of the
18 ethical rule of the bar association. This is my
19 opinion.

20 Q. Okay.

21 A. Please, I will respect yours if, and only if,
22 you respect mine.

23 Q. Of course I respect your opinion.

24 (Exhibit V45 was marked for identification.)

25 BY MR. LAKE:

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1 MRS. CARLA SANTILLI: This is a blog.

2 THE WITNESS: I have never seen the Beall's
3 list.

4 BY MR. LAKE:

5 Q. Okay.

6 A. So, no --

7 MRS. CARLA SANTILLI: [Inaudible].

8 THE REPORTER: I can't have multiple people
9 talking.

10 THE WITNESS: Carla, you have to be silent
11 unless I ask you. Then you have to -- then I
12 stop, pause, and you can talk.

13 I have never seen this Beall's list, in full
14 honesty. I swear. I'm sworn as my testimonial is
15 the truth, so --

16 BY MR. LAKE:

17 Q. I understand. Thank you very much.

18 MR. PARRISH: I'm sorry, was the Beall's list
19 attached as an exhibit, or was it just given?

20 MR. LAKE: It's been marked.

21 MR. PARRISH: Okay. I just didn't get a copy
22 of that.

23 MR. LAKE: Oh, yeah, sure.

24 (A document was handed to counsel.)

25 MR. PARRISH: Thank you.

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1 Q. I would ask -- take a look at Exhibit V45.

2 And does that appear to be one of the articles you're
3 talking about that's picked up on the idea of the
4 American Journal of Modern Physics being a predatory
5 journal?

6 A. I do not know this article. I don't know.

7 MRS. CARLA SANTILLI: Let me see. This is a
8 blogspot. This is a blog.

9 THE WITNESS: It's a blog.

10 MRS. CARLA SANTILLI: It's of no value.

11 BY MR. LAKE:

12 Q. Okay.

13 A. I have no interest in looking --

14 Q. Okay.

15 A. -- in looking at that.

16 Q. Okay.

17 A. No.

18 Q. But you don't have any reason to believe
19 that's not an Internet article about predatory
20 journals?

21 A. I have no reason. I have --

22 Q. Okay.

23 A. I have no interest in reading it.

24 Q. Okay. Let me ask you if this is a copy of
25 the Beall's list?

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1 BY MR. LAKE:

2 Q. Dr. Santilli, authors sometimes use pen
3 names, p-e-n, names, correct?

4 A. Yes.

5 Q. For example, Samuel Langhorne Clemens, the
6 American author, used the pen name Mark Twain, for
7 example.

8 A. That is correct. I'm very familiar. They're
9 used throughout history --

10 Q. Yes.

11 A. -- beginning with Galileo.

12 Q. And you've used pen names, correct?

13 A. Never.

14 Q. You've never used a pen name at all?

15 A. I sign a grant agreement with my name, my
16 signature. No, no.

17 Q. Okay.

18 A. I do not need to, especially if it's
19 something insidious. I'm very honored to put my name
20 in it.

21 Now, careful -- I have to elaborate on this.

22 Careful, because a number of people have copied my
23 statement. We're talking about dozens, if not over 100
24 people -- by "100," I should say scientists -- have
25 copied my statement and published them as an -- under

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1 their own names. But that does not mean that I was
2 the author. I can have many -- I was not prepared, but
3 I can provide you a number of cases in which people
4 have copied mine and made it their own.

5 Q. Do you know the name, Luca Petronio?

6 A. Luca Petronio, yes, I'm -- I know the name,
7 yes, indeed.

8 Q. Okay. Is that the name of an actual person?

9 A. Well, what I can tell you is the following.

10 Q. Dr. Santilli, you can explain. But if you
11 would, just answer my question.

12 Is Luca Petronio the name of an actual --

13 A. No.

14 Q. -- person?

15 A. No, it's not.

16 Q. Okay. Now, please explain, who is the name
17 for.

18 A. I am the founder of the -- this is public
19 notice. I'm the founder -- and I'm very glad to admit
20 it, because it's been created for America, to defend
21 the freedom of scientific thought in America. That's
22 why it's called the International Committee on
23 Scientific Ethics and Accountability, 100 percent in
24 interest of America. I am the founder, the very proud
25 founder of this international committee back 10 or

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1 correct?

2 A. Yes, of course.

3 Q. Okay.

4 A. I was the founder. I am the founder, but I
5 have -- you have to allow me to finish the sentence,
6 because if you cut me back --

7 Q. Please. I just didn't understand you.

8 A. -- then we have a problem. Then -- because
9 then you can twist the situation against me unjustly.

10 So the committee is selected. It's been
11 there, Luca Petronio, since ever. But you can
12 recognize easily the different style in the e-mail or
13 the documents that it's not the same person.

14 Now, here is the point. I am -- I left the
15 committee completely in 2000 and -- I don't remember
16 the exact, but in early 2000 when I became the chief
17 executive officer of Thunder Energies Corporation. And
18 since that time, essentially, I have been completely
19 out of -- out of the operation. There was a clear
20 conflict -- a clear conflict between my position of a
21 U.S. public company traded on NASDAQ. Traded on
22 NASDAQ.

23 MRS. CARLA SANTILLI: As MagneGas.

24 THE WITNESS: This was MagneGas Corporation.
25 I was the chief executive officer of MagneGas

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1 15 years ago. And I can quote -- I can quote a number
2 of regional scientists who immediately participated. I
3 can quote Professor Grigorios Tsagas, chairman of the
4 department of mathematics of Thessaloniki University;
5 Professor Yanusus -- Asterios Jannussis, the senior
6 physicist and one of the most important physicists in
7 Greece.

8 Q. Please explain the connection to that
9 committee to Luca Petronio.

10 A. I will tell you in a moment, if I am allowed.
11 I think it would be good for you to know a little bit
12 of history, if you're interested, but it's up to you.
13 If you cut me off, I think you will lose, but that's my
14 opinion.

15 So the committee was formed, and I was the
16 originator. Then I actually also called Professor Jack
17 Lohmus from Estonia University and a number of others.
18 It's an international committee. They elected -- the
19 committee anonymously elected to use a pseudonym, and
20 it was Luca Petronio.

21 Q. I'm sorry. I didn't understand you.

22 A. I'll repeat it with pleasure. The
23 committee -- the committee elected to use a pseudonym
24 collectively.

25 Q. And you were a member of the committee,

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1 Corporation, a public company eventually traded on
2 NASDAQ. So I withdrew from that committee as
3 continued -- as a continuous operation. And I am
4 occasionally informed of their action, but --

5 BY MR. LAKE:

6 Q. Does the committee continue to use the name
7 Luca Petronio?

8 A. Yes, I think so.

9 Q. Okay. And you do not participate in the use
10 of that name, Luca Petronio, any longer?

11 A. No.

12 Q. But you did until the year 2000 as a
13 committee?

14 A. As part of the committee.

15 Q. Okay. Thank you very much.

16 A. It was -- it was a committee. It was a
17 committee. We're talking about up to the past century,
18 after -- at the end of 2000.

19 (Brief discussion between Mr. Lake and the
20 reporter.)

21 (Exhibit V46 was marked for identification.)

22 THE WITNESS: I have to add that some of
23 the -- I would like to add on the record, please,
24 that some of the statements by Luca Petronio are
25 statements by individual members of the committee

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1 and not necessarily of the committee itself.
 2 BY MR. LAKE:
 3 Q. Luca -- the word "Luca" means "light"; is
 4 that right?
 5 A. Yes.
 6 Q. Okay.
 7 A. In Latin it means --
 8 MRS. CARLA SANTILLI: No, no.
 9 BY MR. LAKE:
 10 Q. I don't speak Italian, I recognize. I'm
 11 asking.
 12 A. Well, it depends --
 13 MRS. CARLA SANTILLI: That's a name.
 14 THE WITNESS: It's a name.
 15 BY MR. LAKE:
 16 Q. It's a name?
 17 A. Luca is a name.
 18 Q. Does it mean "bearer of light"?
 19 A. No.
 20 Q. Do you know why the name was chosen?
 21 A. Luce -- in Italian, luce, l-u-c-e, means
 22 light. L-u-c-a is a name.
 23 Q. Okay.
 24 A. But sometimes in poetry they may have changed
 25 the name in a different spelling.

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1 on Scientific Ethics and Accountability.
 2 Mr. Santilli-Petronio, I ultimately suggest that
 3 you must be the same person.
 4 Basically, they're saying you're the same
 5 person.
 6 THE WITNESS: The same person who is?
 7 MRS. CARLA SANTILLI: Because you said -- as
 8 you can see, Professor Santilli has received life
 9 threats from Christian Corda. Please turn the
 10 ongoing --
 11 THE WITNESS: Which is true.
 12 MRS. CARLA SANTILLI: -- civil suit against
 13 Maria Corda, etc. Thank you, Luca Petronio.
 14 So, basically, they're trying to say that
 15 Luca Petronio and Santilli is the same person.
 16 THE WITNESS: Okay. It is true that I
 17 received life threat --
 18 BY MR. LAKE:
 19 Q. Okay.
 20 A. -- from this -- from this gentlemen.
 21 MRS. CARLA SANTILLI: I don't know.
 22 THE WITNESS: Or gentlemen, I don't think is
 23 appropriate --
 24 BY MR. LAKE:
 25 Q. Okay.

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1 Q. Let me ask --
 2 A. So it's misinterpreted as --
 3 Q. I understand.
 4 A. -- representing light, but it's just a name.
 5 (Exhibit V47 was marked for identification.)
 6 BY MR. LAKE:
 7 Q. Okay. Let me ask you about V47 and see if
 8 you recognize that, especially the e-mail in the middle
 9 of the page.
 10 THE WITNESS: Can you tell me, please, what
 11 this is all about? Can you read it, please?
 12 MRS. CARLA SANTILLI: Criminal charge against
 13 Maria and Christian Corda.
 14 THE REPORTER: I can't understand. I'm
 15 sorry.
 16 MRS. CARLA SANTILLI: Criminal -- it's a
 17 Gmail. Pepijn van Erp -- this is
 18 peijnvanerp@gmail. Criminal charges against Maria
 19 and Christian Corda. I don't know.
 20 And then, Joseph Parrish, as you can see from
 21 the statement: Professor Santilli has received
 22 life threats from Corda, ongoing lawsuit against
 23 Maria Corda and Christian Corda and their
 24 laundering bank into a criminal lawsuit, Luca
 25 Petronio on behalf of the International Committee

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1 A. -- call him that.
 2 Q. Let me ask you some specific questions now
 3 that Mrs. Santilli --
 4 MRS. CARLA SANTILLI: Yes.
 5 BY MR. LAKE:
 6 Q. -- has helped you read the e-mail.
 7 Did you send this e-mail to Attorney Parrish?
 8 A. I do not remember. I'd have to check my
 9 record.
 10 Q. Okay. The paragraph beneath --
 11 A. If I sent -- sorry. Sorry.
 12 Q. Okay.
 13 A. If I sent to Attorney Parrish, Attorney
 14 Parrish, you are here. Did you receive this e-mail?
 15 Q. I don't think he can answer questions right
 16 now.
 17 A. But --
 18 Q. But let me ask you a follow-up.
 19 A. But now you've got it.
 20 Q. Okay.
 21 A. Then the question is, then you must have
 22 gotten it either illegally or some --
 23 Q. Let me ask some questions about it, and then
 24 we'll figure --
 25 A. Sure.

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1 MRS. CARLA SANTILLI: I didn't read the one
2 piece.

3 BY MR. LAKE:

4 Q. Sure.

5 If you look at the next paragraph after the
6 one that we were just discussing, it says, "Please
7 proceed for the filing of the lawsuit against M. Corda
8 and C. Corda's associates, Israel and Pepijn, as
9 planned."

10 A. We never filed --

11 Q. Do you see that?

12 A. -- that lawsuit. We never filed that
13 lawsuit.

14 Q. I understand the lawsuit against the Cordas.
15 But you did file a lawsuit against Israel and Pepijn as
16 planned, correct?

17 A. Yes, of course.

18 Q. Okay. That's why we're here?

19 A. Yes. And that --

20 Q. So the -- the e-mail --

21 A. No.

22 Q. So the e-mail instructing --

23 A. No.

24 Q. -- Attorney Parrish to file this lawsuit was
25 signed by Luca Petronio, correct?

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1 A. You tell me, sir. I have no -- I cannot even
2 read, so I cannot read correctly. It's so --

3 MR. LAKE: Well, Mrs. Santilli, if you would
4 help him.

5 MRS. CARLA SANTILLI: Let me just read the
6 whole thing, because -- okay.

7 THE WITNESS: Yes. If you claim that there
8 it says Luca Petronio, that is Luca Petronio.

9 MRS. CARLA SANTILLI: No. But I think --
10 okay. I need to start from the beginning.

11 "Subject. Criminal charges against Maria and
12 Christian Corda." And then there is this person
13 who is from Joseph Parrish -- from
14 lucascientificethics.org to Joseph Parrish. I
15 don't understand this. Basically, here is
16 Attorney Parrish, and you can see.

17 Basically, Luca Petronio sent an e-mail to
18 Attorney Parrish saying, Please file the lawsuit,
19 because I think you had talked to the attorney,
20 to -- that you wanted to do it, but then ended up
21 never doing it. So, basically -- basically,
22 Christian Corda sent to Pepijn van Erp in his blog
23 or in a separate thing the e-mail that Luca
24 Petronio sent to Attorney Parrish saying,
25 Please -- please file the lawsuit, join the

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1 lawsuit with Professor Santilli. Basically, Luca
2 Petronio was authorized by someone to send this
3 e-mail to Attorney Parrish.

4 THE WITNESS: But --

5 MRS. CARLA SANTILLI: But it's not your
6 e-mail; it's not my e-mail.

7 THE WITNESS: Not. But --

8 MRS. CARLA SANTILLI: Plus, I mean, how -- I
9 don't know --

10 THE WITNESS: Carla.

11 MRS. CARLA SANTILLI: -- this is to be
12 constructed.

13 THE WITNESS: Luca --

14 MRS. CARLA SANTILLI: I never saw that.

15 THE WITNESS: First of all, this is totally
16 not evidence, because this can be -- can be
17 falsified.

18 BY MR. LAKE:

19 Q. Okay. If you don't recognize the e-mail,
20 that's fine.

21 A. I want -- I want to clarify or whatever --

22 Q. Okay.

23 A. -- that this is --

24 THE WITNESS: Can we have a copy of Attorney
25 Parrish --

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1 MR. PARRISH: I have a copy.

2 THE WITNESS: -- because this is a very
3 powerful document in our possession, very
4 powerful. The reason I will tell you --

5 BY MR. LAKE:

6 Q. I produced it in discovery quite some time
7 ago.

8 A. Very powerful document in our possession.

9 Q. You can keep that copy.

10 A. Thank you. Thank you.

11 Q. So the -- in fact, after -- this e-mail is
12 dated June 24, 2016, correct, the date on that e-mail?

13 A. I don't know.

14 MRS. CARLA SANTILLI: It's June 24th, 2016,
15 yes.

16 BY MR. LAKE:

17 Q. Okay.

18 A. I don't know.

19 Q. And this lawsuit was filed in August of 2016,
20 correct?

21 A. To my recollection. And Attorney Parrish --

22 Q. Okay.

23 A. -- can verify or deny.

24 Q. So you were using the
25 luca@scientificethics.org e-mail to communicate with

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1 Mr. Parrish in June of 2016, correct?
2 MR. PARRISH: Object to the form of the
3 question.
4 MRS. CARLA SANTILLI: Luca Petronio --
5 THE WITNESS: No, I don't know.
6 MR. PARRISH: Carla, you've got to --
7 THE WITNESS: I don't understand the
8 question.
9 MR. PARRISH: You've got to let him answer.
10 You can't answer for him.
11 THE WITNESS: No, I -- Carla.
12 MRS. CARLA SANTILLI: Because he didn't see
13 it.
14 MR. PARRISH: No, no, it's okay.
15 THE WITNESS: Carla, quiet down, because
16 they're right. If you pause to speak -- ask --
17 ask the possibility to speak and they will comply.
18 They are asking questions that I -- that they
19 have no legal grounds that I can possibly foresee.
20 BY MR. LAKE:
21 Q. Okay.
22 A. Remember, I'm no longer a member since I
23 became a public -- the chief executive officer of
24 Thunder Energies Corporation, a United -- a publicly
25 traded company. And I'm no longer a member of the

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1 the beginning, including the domain name.
2 Q. Okay.
3 A. When I left, because I became -- I assumed
4 the position of chief executive of Thunder Energies
5 Corporation, I relinquished everything. I asked our
6 web master even to move the domain name and is no
7 longer under -- it was originally filed as part of the
8 Institute for Basic Research, IBR. It is no longer now
9 recorded.
10 Q. Okay.
11 A. So, therefore, not to restrict your
12 later implying that the documents -- they apply now --
13 now they do not apply. This is no longer a valid
14 document.
15 Q. Okay. Let me ask you some questions about
16 it.
17 If you'll look in the line that says
18 "registrant," in other words, the person who the domain
19 is registered to, the name there is Luca Petronio,
20 correct?
21 A. If you tell me so. I'll come over --
22 Q. Would you take a look, please?
23 A. With my eyesight, I cannot. I accept your --
24 look, there is no need to --
25 Q. Okay.

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1 International Committee of Scientific Ethics. And
2 whatever happened since that time, I will not assume
3 responsibility.
4 Q. Okay. Let me ask you to -- about domain name
5 registrations.
6 (Exhibit V48 was marked for identification.)
7 BY MR. LAKE:
8 Q. Do you -- are you familiar with the process
9 of registering a domain name?
10 A. Yes, I am.
11 Q. Okay.
12 A. Yes, I am.
13 Q. I believe this is a registration for the
14 domain name scientificethics.org --
15 A. Yes.
16 Q. -- if you would take a look at that.
17 A. Yes, indeed.
18 Q. And you're familiar with that website,
19 correct?
20 A. Yes, I am familiar. But this -- after I
21 left, this has been -- this has not been a -- this not
22 recent. It has to be very recent. The domain name has
23 been -- is no longer owned by -- you see, I was the
24 founder of Scientific Committee of -- International
25 Committee on Scientific Ethics, so I did everything at

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1 A. There's no need to -- if you tell me --
2 Q. The address here is 35246 U.S. 19 North. Are
3 you familiar with that?
4 A. Yes, that's my address. That is correct.
5 Q. That's your address?
6 A. Yes, yes.
7 Q. Okay. And the phone number, if you turn over
8 to the second page of the exhibit, is (727) 688-3992.
9 Do you recognize that phone number?
10 A. Repeat, again, the number.
11 Q. Sure. (727) 688-3992.
12 A. Yes.
13 MRS. CARLA SANTILLI: Our number, yeah.
14 THE WITNESS: Yes, yes.
15 BY MR. LAKE:
16 Q. Whose phone number is that?
17 A. Yes, it is --
18 MRS. CARLA SANTILLI: It's your cell phone.
19 THE WITNESS: It's my cell number.
20 BY MR. LAKE:
21 Q. Your cell phone number?
22 MRS. CARLA SANTILLI: But we need to see --
23 THE WITNESS: Yeah.
24 MRS. CARLA SANTILLI: -- the address.
25 MR. LAKE: It's on the exhibit.

<p>Page 74</p> <p>1 MRS. CARLA SANTILLI: Oh, let me see it, 2 because in that -- okay. What is the address? 3 Yeah, you need to find -- it's not our address. 4 This is Unit 225. 5 THE WITNESS: No, not -- 6 MRS. CARLA SANTILLI: This is not an address 7 that we know. 8 THE WITNESS: No, it's not mine. 9 BY MR. LAKE: 10 Q. What is at that street address, 35246 U.S. 19 11 North? 12 A. It's a mailbox. 13 Q. It's a mailbox? 14 MRS. CARLA SANTILLI: Yeah. 15 THE WITNESS: Yes, yes. 16 MR. LAKE: Okay. 17 MRS. CARLA SANTILLI: And the mailbox -- I 18 don't recognize the mailbox. 19 BY MR. LAKE: 20 Q. Okay. So you have a different unit number -- 21 MRS. CARLA SANTILLI: Exactly. 22 THE WITNESS: Yes. 23 BY MR. LAKE: 24 Q. -- on your mailbox but at the same street 25 address?</p>	<p>Page 76</p> <p>1 website ibr.org. 2 A. I founded it. 3 Q. Okay. It's for the Institute for Basic 4 Research, right? 5 A. Of which I am president. 6 Q. Of which you are president? 7 A. (Nods affirmatively.) 8 Q. And so did you register that domain name, 9 ibr.org? 10 A. To my recollection, yes. 11 Q. Okay. If you would take a look at that. I 12 believe that's the -- who is that of ibr.org? 13 THE WITNESS: Can you read this? 14 MRS. CARLA SANTILLI: So what is the -- 15 THE WITNESS: Carla, address the question to 16 me, please, and then I answer. 17 MRS. CARLA SANTILLI: Right. This is 1444. 18 The address is 1444. 19 BY MR. LAKE: 20 Q. The registrant name for ibr.org is Thunder 21 Energies Corporation. That's one of your companies, 22 correct? 23 MRS. CARLA SANTILLI: I don't know that. 24 THE WITNESS: This is a publicly traded 25 company, not our company.</p>
<p>Page 75</p> <p>1 MRS. CARLA SANTILLI: Exactly. 2 THE WITNESS: That is correct. 3 BY MR. LAKE: 4 Q. Okay. And then -- and then I was asking you 5 about the phone number, and I think you were indicating 6 you recognize that number, (727) 688-3992? 7 MRS. CARLA SANTILLI: Yeah. 8 A. Yes, I do. 9 BY MR. LAKE: 10 Q. And that's your cell phone number? 11 A. It is. 12 Q. Okay. 13 (Exhibit V49 was marked for identification.) 14 BY MR. LAKE: 15 Q. Exhibit 49, please. Dr. Santilli, if you 16 would take a look at that. You're familiar with the 17 R.M. Santilli Foundation, correct? 18 A. Yes, I do. 19 Q. And I will represent to you this is the 20 contact page from the website for the foundation. And 21 you see there it lists as contact information the 22 telephone number we just discussed, (727) 688-3992, 23 correct? 24 A. That is correct. 25 Q. Okay. Tell me what you know about the</p>	<p>Page 77</p> <p>1 (Exhibit V50 was marked for identification.) 2 BY MR. LAKE: 3 Q. Yes. But this domain, ibr.org, is registered 4 to Thunder Energies Corporation, correct? 5 A. Not now. 6 Q. Well, the words are on that document, though, 7 correct? 8 A. That may be a temporary mistake. Unless you 9 identify the date, it may be tricky. It may be -- 10 Q. Okay. Well, this was printed -- there is a 11 date at the top left corner. 12 A. No, not the printing. 13 Q. Okay. 14 A. The date of registration. You don't trick 15 me. 16 Q. Okay. 17 A. Don't try to trick me with the -- 18 Q. I'm not trying to trick you, Dr. Santilli. 19 A. Yes, you are. But about the date of this 20 document, who cares less. But if you tell me the date 21 of the registration, then I -- then I will respect 22 that. 23 Q. Okay. Well, it is here. It was created -- 24 the domain was created in January of 2000, and the 25 updated date was April of 2015.</p>

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1 Do you see that there?

2 A. The updated domain name, that -- I have to
3 see under which ownership, but I believe, to my
4 recollection, I'm -- I have to do an investigation for
5 this. I'm not prepared for this. I have to look at
6 what happened to the history.

7 Q. Okay. Well, I'm just asking you what the
8 document says. I understand you didn't bring any
9 history with you today.

10 Let me ask you about the second page --

11 A. I do not have --

12 Q. -- of the exhibit.

13 A. At this moment I do not know who is the owner
14 of -- it is my knowledge, but I have to verify the
15 evidence that the domain name IBR is independent from
16 Thunder Energies.

17 Q. Okay.

18 A. It has no connection with Thunder Energies.
19 Thunder Energies is a public company.

20 Q. Okay.

21 A. So there is no connection.

22 Q. If you would just let me ask you a question
23 about the second page of that document --

24 A. Please.

25 Q. -- and take a look at it.

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1 registration information lists you as admin --

2 Thunder Energies as the admin organization and the same
3 phone number, (727) 688-3992?

4 A. It could be. I have to verify the existence
5 of the status and, if there have been any change, the
6 date of the changes.

7 Q. Okay.

8 A. It's very important the date, because those
9 things -- those documents will change in time several
10 times.

11 Q. Who is George Weiss?

12 A. I don't -- George Weiss was an editor of a
13 group in Germany decades and decades ago.

14 Q. And did you work with him professionally?

15 A. Yes.

16 Q. Okay.

17 A. He was the editor living somewhere in New
18 York. I don't even what it was.

19 Q. Are you familiar with an article from a Latin
20 American scientist named Waldemar Rodriguez --

21 A. He's a --

22 Q. -- concerning you and --

23 A. He's a scientist. He died many years ago.

24 Q. Okay. Are you familiar with an article in
25 which he suspected George Weiss was an alterego of

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1 A. Go ahead.

2 MR. LAKE: Mrs. Santilli, could Dr. Santilli
3 look at that, please?

4 THE WITNESS: Yes.

5 BY MR. LAKE:

6 Q. On the second page of the document, do you
7 see the -- about the sixth line down, it says, "Admin
8 name, Ruggero Santilli."

9 Do you see that?

10 A. Yes.

11 Q. Okay.

12 A. I don't see it, but I believe you it is the
13 truth what you tell me. I have no reason to doubt it.

14 Q. Is there something we could do to help you
15 read documents, because that's pretty important?

16 A. I have macular degeneration, so I have
17 problems. There's nothing you can do, unfortunately.

18 Q. Okay.

19 A. I can drive very well, because I have -- I
20 have a problem in the macular, problems in my macular,
21 for your -- for your knowledge --

22 Q. Okay.

23 A. -- certified by the doctors.

24 Q. All right. But you don't have reason to
25 disagree with me that the -- that the ibr.org domain

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1 yours?

2 A. Well, I have been accused by so many. This
3 is another one. Oh, not only George Weiss, but I had
4 many -- any time -- any time that they -- well, they're
5 call Einstein fanatics; they're called Einstein
6 fanatics -- disagree with my papers. They
7 immediately -- that anybody who disagreed or tried to
8 go beyond Einstein was dubbed -- was dubbed a Santilli
9 alias. So I have a long list. This is not the only
10 one.

11 Q. Tell me more about the Einstein fanatics.
12 Who are they?

13 A. The Einstein fanatics are scientists who
14 dishonestly -- dishonestly abuse governmental money,
15 money of the United States taxpayers -- the United
16 States taxpayers -- to claim that Einstein's special
17 relativity is valid for all possible conditions -- is
18 valid for all possible conditions existing in the
19 universe.

20 What then scientific statement is that
21 Einstein's special relativity is incontrovertibly valid
22 for the conditions stated by Albert Einstein -- for the
23 conditions stated by Albert Einstein -- which is for
24 point particles and electromagnetic waves propagating
25 in a vacuum.

<p>Page 82</p> <p>1 The word "vacuum" is removed because of 2 political interest in science, and the claim is twisted 3 into a universal validity of special relativity for all 4 possible conditions existing in the universe, including 5 for extended particle inside a star, extended particle 6 in -- within -- within -- within the physical media, 7 and so on. 8 Q. Okay. 9 A. And this has created a problem -- of enormous 10 problem of scientific ethics in the United States of 11 America, which is acquired now in historical 12 proportion, because it's a distortion of evidence. 13 Because the uncontrovertible validity of Einstein's 14 special relativity formed the conditions so clearly 15 identified by Einstein, for monetary, financial -- 16 financial, ethics -- in other words, are extended to 17 all conceivable conditions that exist in the universe 18 but without experimental evidence. There is 19 incontrovertible experimental evidence that special 20 relativity is exactly violate under the conditions 21 stated by Einstein. 22 Point particle, in a typical case, an 23 electron orbiting around the nucleus in the hydrogen 24 atom, that's beyond any possible doubt. But the moment 25 that same electron enters into a core of a star, it is</p>	<p>Page 84</p> <p>1 So Albert Einstein opposed it, and he died without 2 accepting the expansion of the universe. 3 Q. Let me ask you about a couple of passages -- 4 A. Sure. 5 Q. -- in the Ethical Probe. 6 A. Sure. 7 Q. I was going to ask you to read them, but I 8 will read them and -- 9 A. No, no, I cannot read it. I'm sorry. 10 Q. I understand. 11 In talking -- I think you were talking here 12 about this problem you've just described. This is in 13 the foreword to the book on page 2. 14 MR. LAKE: And, Joe, I'll give you copies at 15 the appropriate time. 16 THE WITNESS: I'll give -- I'll give you 17 copies. 18 MR. LAKE: And they've been produced. 19 THE WITNESS: I have a copy for you, Attorney 20 Parrish. I will give it to you. 21 MR. PARRISH: Thank you. 22 BY MR. LAKE: 23 Q. Okay. "The problem is instead of a much more 24 insidious nature and consists of manipulatory practices 25 on truly fundamental physical issues perpetrated by</p>
<p>Page 83</p> <p>1 immersed in a hyperdense medium. Then a conjecture of 2 validity can be stated, but not a certainty. This is 3 used to get money, grants, and so on. 4 Q. And you identified that by, in among other 5 things, the Ethical Probe on Einstein's Followers in 6 the USA, correct? 7 A. Of which I have been very proud of author of 8 that book. 9 Q. Okay. 10 A. It's the most famous book I've written. 11 Q. And so it's famous. And you agree with it 12 still, correct? 13 A. Of course. 14 Q. Okay. 15 A. Notice I praise Einstein. I attack Einstein 16 followers, because they use and abuse to get money. 17 Einstein conditions -- for condition -- one of the 18 reason I'm so strong -- I am one of the strongest 19 support of Einstein because he opposed those groups. 20 As an example -- a historical example to 21 prove beyond doubt that Albert Einstein opposed the 22 conjecture of the expansion of the universe because -- 23 because it was disproven by so much evidence. It 24 implies the earth is at the center of the universe. I 25 could stay the entire day the inconsistency of this.</p>	<p>Page 85</p> <p>1 overlapping rings of academic, financial, ethnic 2 interests in the highest levels of the physics 3 community." 4 You agree with that, correct? 5 A. Absolutely. That's my statement. 6 Q. And it's still true? 7 A. Yes. I agree 100 percent. 8 Q. That's right. 9 MR. PARRISH: And, Mr. Lake, for the record, 10 is there a page number that goes along with that? 11 MR. LAKE: Yeah. That was page 2. 12 MR. PARRISH: Okay. 13 MR. LAKE: And I'm about to read a sentence 14 from page 3. 15 BY MR. LAKE: 16 Q. Talking about why you -- why you wrote the 17 book and why you're describing this problem, I think, 18 you said, "I could not have possibly remained in the 19 USA while silently watching that scientific future 20 being jeopardized by rather unprecedented extremes of 21 scientific, academic, ethnic greed." 22 Do you recognize that as -- 23 A. Absolutely. 24 Q. -- words you wrote? 25 A. I confirm it as of today. Actually, this was</p>

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1 written in 1984. I'm -- I am an American because I
2 love America. And this book has been written for my
3 love of this country.

4 Q. Very good.

5 A. And that's why -- this is one of the biggest
6 abuses of the United States, of this country, this
7 beautiful country, by organizers, by dishonesty.

8 Q. Let me read you one other passage. This is
9 also from the foreword, page 7.

10 The hostility you've described, you say,
11 "Originated with vested academic, financial, ethnic
12 interests, who apparently oppose the conduction of the
13 studies for the sole support of personal gains and
14 disrespect for the interests of America, as well as of
15 the society at large."

16 A. I confirm this 100 percent. I came to
17 America as wealthy and the son of a medical doctor. I
18 didn't -- I had no need to come to America. I came to
19 America because I love the country, and I intend to --
20 many other physicists who have been dissident and been
21 chased out of America or killed, as the case of Eugene
22 Malloy [phonetic], who is my former colleague at MIT.
23 He was killed under very mysterious circumstances that,
24 perhaps, Attorney Parrish, you shall ask me after the
25 meeting, because it is pertinent, the assassination,

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1 There are -- first of all, in that state they
2 are -- they are organized, not talking about an
3 individual. So we're talking about a documented -- an
4 organization documented before -- beyond any --
5 incidentally, what I'm about to say is at the
6 foundation of this lawsuit as well. So, first of all,
7 they're organized.

8 Secondly, they are academic. The biggest --
9 once you are in academia -- and I reached the top of
10 academia, a position at Harvard, funded by the
11 Department of Energy. I could not go higher. The
12 biggest interest, whether you are Italian, Spanish,
13 Jewish, German, your academia is the top, top rail.

14 Secondly, when you are -- when you are --
15 it's financial. If you got no money, you got no
16 salary, you are trashed out.

17 Finally, there are ethnic interests. Now,
18 this ethnic -- this word "ethnic" has been twisted by
19 Jews and scientists, including Frank Israel, as
20 referring solely to Jewish, which is absolutely
21 dishonest to say, because -- because there are -- for
22 instance, Spanish people are non-Jewish, are the most
23 fanatical of Einstein. So it is [inaudible]. So it is
24 an intentional twist to damage.

25 So what does it mean, the application? It

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1 the murder of -- and I have received life threats
2 myself.

3 Q. Let me ask you about another passage of the
4 book, please.

5 A. Yes. Sorry. I missed -- I missed -- the
6 point is because I'm very proud to be the author of
7 that statement.

8 Q. Okay. And --

9 A. We are fighting for America here.

10 Q. This is from page 85 of the book and, I
11 think, makes a similar point.

12 You say, "When vested academic, financial,
13 ethnic interests on Einstein's ideas endanger or
14 jeopardize, even minimally, the security of this
15 country, I cannot be silent."

16 That's still true, correct?

17 A. I confirm this 100 percent. I love this
18 country.

19 Q. What are the ethnic interests you were
20 talking about?

21 A. They are what's stated there repeatedly. Let
22 me elaborate --

23 Q. Please.

24 A. -- without -- 30 seconds. But no
25 interruption, please. Otherwise, I get nervous.

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1 means all -- all -- all ethnicity have an interest in
2 Einstein theory. Basically, this is what -- and they
3 have -- they have twisted -- they have twisted the
4 reality. And that's why I am a leader -- a leader on
5 this, now, movement that cannot be assassinated
6 anymore.

7 Q. So the ethnic interests you talked to --
8 talked about in these passages of ethical probe, that
9 refers to Jewish people and Spanish people? Is that
10 what you're saying?

11 A. It includes all --

12 MR. PARRISH: Object to the form.

13 THE WITNESS: Do you want to say something?

14 MR. PARRISH: I just objected to the form.

15 You can still answer.

16 MRS. CARLA SANTILLI: Yeah, yeah, of course.

17 THE WITNESS: I can answer?

18 MR. PARRISH: Yes.

19 BY MR. LAKE:

20 Q. Please.

21 A. Yes, the truth cannot be changed. It's known
22 everywhere to people in good faith.

23 Q. Okay.

24 A. Crooked people -- it refers -- first of all,
25 to Jewish -- of course, you cannot deny the Jews as

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1 part of it. Einstein was Jewish, so to deny that
2 it's -- it just would be something, because I would
3 feel against my moral principle.

4 But it includes, basically, everybody and all
5 the scientists that may have received a chair on
6 Einstein theory. This includes -- and among them, I
7 was about to say, the most fanatics are the Spanish
8 people. The Spanish and South America, for instance,
9 are known to be the most fanatic. Even though they're
10 not Jewish, they're known to be -- most fanatics aren't
11 Jewish here. But there are also other ethnic -- ethnic
12 groups, of course.

13 So there is a long list of ethnicity that --
14 that are included and documented in the case,
15 documented in that denomination, which I'm very proud
16 to have -- it's known now all over the world, and in
17 history. I'm very proud of it.

18 Q. And the particular ethnic group that you
19 mentioned Einstein was a part of was Jewish people,
20 correct?

21 A. Yes, of course.

22 Q. Okay.

23 A. But not all -- not all Jewish people. Some
24 of my Jewish friends -- a lot of my best friends are
25 Jewish. My son-in-law is Jewish, to begin with. So we

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1 have Jewish people in our family. But, for instance,
2 let me make an example. My best friends are in
3 Israel -- not only an example -- I was invited in
4 Israel to present for an International Congress. I
5 forget the --

6 MRS. CARLA SANTILLI: Well --

7 THE WITNESS: It's okay, Carla.

8 I was invited in Israel for an International
9 Congress on gravitation. And I was not -- I was
10 not able to obtain it for many reasons. I
11 presented a paper on surpassing Einstein's
12 gravitation. The paper was published by the
13 editor. They are from -- they are from Jerusalem.

14 Oh, here it is. This is the International
15 Congress. And here you can see the editor is from
16 Israel. They published my paper. And they
17 published my paper that was very respectful
18 beyond -- beyond Einstein. And those -- and those
19 scientists from Israel, they are some of the best
20 supporters that I had throughout my life. And
21 they're quoted in many, many of my papers, so --

22 BY MR. LAKE:

23 Q. Dr. Santilli, let me ask you.

24 A. Let me finish. I'm sorry.

25 Q. Okay.

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1 A. So we're talking about the very small -- this
2 is very important. Attorney Parrish, I need your legal
3 assistance to clarify this. I want to repeat this
4 statement twice.

5 What we are talking about is Einstein
6 fanatical supporters, which is read everywhere. We're
7 talking about I want to testify with evidence, such as
8 this one, supported by Israel, supported by the payment
9 of the -- the payment of the -- but I'm talking about a
10 very small minority of the Jewish community. We're
11 talking about physicists, which a limited number of
12 Jewish physicists are fanatical Einstein and wants the
13 Einstein theory to be valid for all conceivable
14 conditions existing in the universe. In this respect,
15 there's clear evidence that there are limitations, as
16 is the case for all physical theory.

17 But the very large number of Jewish
18 physicists have supported me and are continuing to
19 support me. Here, there are two.

20 THE WITNESS: Carla, please read the Jewish
21 authors from Israel or the author that published
22 my book there. Read the names of them -- of the
23 editor. One is Roffini, but the others are
24 Jewish.

25 MRS. CARLA SANTILLI: The Hebrew sponsor,

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1 the --

2 THE WITNESS: No, no. The author of these
3 proceedings, the author.

4 MRS. CARLA SANTILLI: Peron.

5 THE WITNESS: Peron is the head of -- one of
6 the most important Jewish physicists in Israel.

7 BY MR. LAKE:

8 Q. Okay.

9 A. My great supporter, incidentally, and a
10 person I respect greatly because he's a real scientist.

11 Q. Dr. Santilli, let me ask you a question. In
12 your answer, you've mentioned Dr. Israel.

13 A. I mentioned?

14 Q. You mentioned Frank Israel.

15 A. Yes.

16 Q. How do you -- I think you said Frank Israel
17 is Jewish. Is that you what said?

18 A. Yes, of course.

19 Q. Why is that "of course"? Why?

20 A. I believe. It could not be, necessarily.

21 Q. Why do you believe it's true, though?

22 A. Let me make the statement.

23 Q. Please.

24 A. If I made any statement, I will correct it.

25 To my understanding at this moment, without any

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1 verification, I heard that Frank Israel is Jewish.

2 Q. Who did you hear that from?

3 A. Discussions, meetings, the last meeting we
4 had in China, so --

5 Q. And why is that significant?

6 A. It's not a question of significance, no.

7 I --

8 Q. You remembered it. Why do you remember his
9 ethnicity?

10 A. Because we are discussing this academic,
11 financial, and ethnic interest. Frank Israel, since he
12 has the name "Israel," it is generally -- generally
13 known to be as -- to be Jewish. However, honestly, I
14 have no evidence that he is -- nobody has evidence that
15 he's Jewish. In any case, assuming that he's Jewish,
16 what's wrong with that, with being Jewish? I see
17 nothing wrong, absolutely nothing wrong to be Jewish,
18 unless -- and I insist on this point -- unless you want
19 to hide it for some idea -- some ideas that are very
20 unequivocal in the United States of America. No, we
21 all are equal in our ethnic identity. And I am
22 Italian, and I'm honored when -- people say, Ruggero
23 Maria Santilli is of Italian background. I'm very
24 honored. The Jewish people that I know and respect are
25 the same. They're very honored to be identified as

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1 interested in Einstein theory. But Einstein, in my
2 opinion -- and I want to be on the record -- is one
3 of -- indeed has his place in history because he
4 deserves it 100 percent. He has been one of the
5 greatest scientists produced by mankind, is my opinion.

6 Q. So I just want to make sure I understand you
7 correctly. You believe that Frank Israel is part of
8 the vested academic, financial, ethnic interests in
9 Einstein's ideas, correct?

10 A. What I heard. But I have no evidence -- no
11 evidence -- no evidence that this is the case, none.

12 Q. Okay. But that's the reason you named him in
13 this lawsuit, correct?

14 MR. PARRISH: Objection.

15 BY MR. LAKE:

16 Q. That's the reason you named him in this
17 lawsuit?

18 MR. PARRISH: Object to the form of the
19 question.

20 THE WITNESS: This is ridiculous.

21 BY MR. LAKE:

22 Q. Why did you name Frank Israel in this
23 lawsuit?

24 A. Because he -- let me -- don't cut me off;
25 otherwise, I leave, because I can take manipulation up

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1 Jewish, yes. Why not?

2 Q. What religion is Pepijn van Erp?

3 A. I have no idea.

4 Q. Okay. And let me ask you about -- you
5 mentioned Jewish and Spanish people --

6 A. And other ethnics.

7 Q. -- referring to Einstein. Let me ask you,
8 what ethnic groups do not have an interest in
9 Einstein's theories?

10 MR. PARRISH: Object to the form of the
11 question.

12 MRS. CARLA SANTILLI: Yeah.

13 THE WITNESS: To my knowledge, none of the --
14 they have no interest -- to my knowledge, the
15 Chinese people couldn't care less whether
16 Einstein was -- they look at Einstein as a
17 scientist. Whether he's Jewish or not, they
18 couldn't care less.

19 BY MR. LAKE:

20 Q. Okay.

21 A. There may be other -- other people. For
22 instance, in the Middle East, they're very, very -- you
23 know, the Middle East is a nightmare, and some of the
24 Middle East, and all this conflict, they couldn't care
25 less whether he's Jewish or not. They're not

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1 to a point, and then I have my dignity. And I'll take
2 the consequence, but you take also yours.

3 Q. Why did you name Frank Israel in this
4 lawsuit?

5 A. Because -- because for a number of reasons.
6 First of all, because the most important -- the most
7 important website attacking me is the website, the
8 official website, of the -- of the Dutch -- in Dutch,
9 of the Skeptics Society, of which he is president.
10 And, therefore, he cannot deny -- he cannot deny that
11 he's responsible of the content of his website in
12 Dutch. You shall have it translated. You have plenty
13 of money by the people who are paying you to have that
14 website translated, because sooner or later, it will
15 come out.

16 Q. And that's not -- you're not talking about
17 the website where the articles by Pepijn van Erp were
18 posted? You're --

19 A. No, no. Pepijn van Erp is a little puppet.

20 Q. Okay.

21 A. No.

22 Q. Tell me what --

23 A. -- let me --

24 Q. Dr. Santilli --

25 A. I have a problem -- I have a problem because

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1 you interrupt my statements. This is a manipulation of
2 my statement. I'm beginning to get nervous.

3 Q. I would just like you to answer my question.

4 A. Do not interrupt continuously, because if you
5 dream of manipulating me, I leave.

6 Q. I'm not trying to manipulate you,
7 Dr. Santilli.

8 A. Then let me make my statement.

9 Q. All right. If you --

10 A. Without interruption.

11 Q. Let me repeat my question, though.

12 A. And I will answer it if I'm not interrupted.

13 Q. Okay.

14 A. Otherwise, I leave and we will go in front of
15 the judge.

16 Q. Let me ask -- let me ask you why -- you've
17 explained that there's another website that you believe
18 Frank Israel is involved with. My question is why did
19 you name Frank Israel in this lawsuit?

20 A. Because the -- because the -- because the
21 primary website attacking me is the official website of
22 the Dutch Skeptics Society that is available in the
23 Dutch language. And that is why -- then the website
24 that you know by Pepijn, that's a very tangential --
25 it's a translation of a guy making -- but those are

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1 meeting to convince, you have to be clear.

2 Q. I'm not trying to convince you of anything;

3 I'm just trying --

4 A. Then --

5 Q. -- to ask you questions.

6 A. Then you -- do you control me? Yes or no,
7 that Frank Israel, as president of the Dutch Skeptics
8 Society, is responsible for the content of his website?
9 Yes or no.

10 Q. I'm not allowed to answer questions.

11 A. Then to Attorney Parrish, I want to leave,
12 because this is beyond the level I can tolerate.

13 That's all I can tolerate, I can take.

14 MR. PARRISH: Dr. Santilli, I hope that we
15 can continue. But if you feel that you need to
16 leave, you know, you've talked to me about that,
17 and I've talked to you about, but --

18 THE WITNESS: There is a limit of
19 manipulation.

20 MR. PARRISH: How about if -- can we -- do we
21 have a pending question right now?

22 MR. LAKE: We can take a break.

23 MR. PARRISH: How about we take a break and
24 let's talk real quick? Is that --

25 THE WITNESS: I want to make a statement

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1 translations from their website in Dutch, of which
2 Frank Israel, being the president of that society, is
3 directly responsible.

4 Q. Okay. So he's --

5 A. That's -- he's the one.

6 Q. -- responsible because he's the president,
7 correct?

8 MRS. CARLA SANTILLI: Yes.

9 THE WITNESS: Of course. He's the president.

10 BY MR. LAKE:

11 Q. Right.

12 A. Otherwise, you think the president is not
13 responsible of the company?

14 Q. Right.

15 A. Is that what you mean?

16 Q. No, no.

17 A. The president is not responsible because he's
18 your customer, so, therefore, the president is not
19 responsible. That's what you meant when you
20 interrupted me?

21 Q. No, that's not what I meant.

22 A. That is -- let me clarify.

23 Q. Dr. Santilli, I'm trying to ask you a
24 question.

25 A. Then I have to clarify. If you want this

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1 before the break.

2 MR. PARRISH: Sure.

3 THE WITNESS: I want to have it on record.

4 What we're talking about in this -- my wife
5 and I, we filed this lawsuit because -- because we
6 want to serve the interests of the United States
7 of America. To our knowledge, we have been
8 attacked by foreigners. Frank Israel is a
9 foreigner. Pepijn van Erp is a foreigner. Our
10 country has been attacked by foreigners in its --
11 in the most vital function, the pursuit of,
12 basically, new research, including, basically, new
13 research for new weapons. New weapons that
14 America needs to defend ourselves.

15 So what is at stake -- and I reserve -- I
16 want to have this -- I will speak very slowly. I
17 reserve the right to make my own judgment as to
18 whether the attorney here present -- attorney -- I
19 don't remember attorney -- I don't remember.
20 Attorney Parrish, can you tell me full name of
21 those two individuals, please?

22 MR. PARRISH: I can't -- I can't give you
23 information to testify.

24 THE WITNESS: Okay. In any case, Attorney
25 Mc -- I don't know.

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1 MR. McGUIRE: McGuire.
 2 THE WITNESS: Attorney McGuire.
 3 And your name, Attorney?
 4 MR. LAKE: Lake.
 5 THE WITNESS: Your real name or just a fake
 6 name?
 7 MR. LAKE: That's my real name, since I was
 8 born.
 9 THE WITNESS: If you say so. I am -- and I
 10 forgot now. I forgot the statement.
 11 MRS. CARLA SANTILLI: Let's take a break.
 12 THE WITNESS: No. Let me finish the
 13 statement. Do you remember what, Carla, what I
 14 was saying?
 15 MRS. CARLA SANTILLI: No, I don't know what
 16 you were saying.
 17 THE WITNESS: Can anybody -- can you read me
 18 what I stated, please? Because I was -- there was
 19 an interruption and I want to continue.
 20 (A portion of the record was read by the
 21 reporter.)
 22 THE WITNESS: I reserve the judgment whether
 23 the attorney, both of you, McGuire -- I'm sorry.
 24 MR. McGUIRE: McGuire.
 25 THE WITNESS: McGuire, an attorney, whether

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1 you are -- you verify the code of ethics of the
 2 United States of America to -- all you are
 3 violating it to serve foreign interests attacking
 4 us in the most vital function, surpassing Einstein
 5 for new weapons, new theories, new industry. So
 6 you will be judged. So I have to put you on line
 7 on this, that you will be judged.
 8 Whether you have to make -- you have to -- my
 9 advice to you, you should have uncontrovertible
 10 proof for this. I'm accused that I fake -- that I
 11 fake the prize at the -- the prize of the
 12 international meeting in France. You have to have
 13 a proof that, indeed, I faked the prize. And if
 14 you think so lightly of the fake position of your
 15 defendant, you become a source. That's why I
 16 don't call the defendants your -- I call your
 17 defendants your people. I do not know the
 18 relationship between you and your defendant.
 19 Also, I want to be on the record that we want
 20 to know -- eventually want to know who pays
 21 Attorney McGuire and Attorney -- your name again?
 22 MR. LAKE: Lake.
 23 THE WITNESS: I would like to know who pays
 24 them. Are they paid by [inaudible] insisting
 25 rumors and the people who are watching this

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1 lawsuit? Frank Israel and Pepijn van Erp do not
 2 have the money to pay them, so they are paid by
 3 U.S. money. So we want to know, since we are
 4 serious Americans -- we are Americans serious in
 5 the United States of America. We want to know who
 6 pays those two attorneys to support the interests
 7 so clearly damaging to the military of our
 8 country, let alone the freedom -- the freedom of
 9 research.
 10 End of my speech.
 11 And so that's why it is my opinion that this
 12 lawsuit is just a beginning, and there are a
 13 number of -- besides, it will be continued in
 14 Europe, in any case, independently, or whatever
 15 the case is. And once we pass through Europe,
 16 then the perspective will be completely different.
 17 Thank you for --
 18 MR. PARRISH: Watch your microphone,
 19 Dr. Santilli, and we'll take a quick break --
 20 THE WITNESS: Thank you.
 21 MR. PARRISH: -- if that's okay with you.
 22 MR. LAKE: Yeah.
 23 THE VIDEOGRAPHER: At 11:35 a.m. we are going
 24 off the record.
 25 (A recess was taken.)

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1 THE VIDEOGRAPHER: At 11:53 a.m. we are on
 2 the record.
 3 BY MR. LAKE:
 4 Q. Dr. Santilli, I think you told me earlier
 5 you're president of the Institute for Basic Research,
 6 correct?
 7 A. Yes.
 8 Q. And Jeremy Dunning-Davies -- I'm sorry --
 9 Jeremy Dunning-Davies is a scientist who's affiliated
 10 with the institute, correct?
 11 A. That is correct.
 12 Q. And he -- and you respect him?
 13 A. Very much so.
 14 Q. Yeah.
 15 He -- generally, you agree with him?
 16 A. Not necessarily. Just I respect him as a
 17 person. But we respect each other.
 18 Q. Okay.
 19 A. Therefore, we respect our own view for
 20 whatever the value is.
 21 Q. Okay.
 22 A. We are democratic scientists.
 23 Q. Sure.
 24 A. We are not totalitarian scientists.
 25 Q. You're familiar with his book, Exploding a

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1 Myth --

2 A. Oh, yes, I do.

3 Q. -- Conventional Wisdom?

4 A. Yes, I do.

5 Q. In fact, it was -- in his title page he lists
6 as his credentials, Department of Physics, University
7 of Hull, and Institute for Basic Research, Palm Harbor,
8 Florida.9 So, clearly, disclosing his connection to the
10 institute?11 A. Yes. Proud to confirm that he is a member of
12 the -- honorary member. They're not paid members.

13 Q. Okay.

14 A. The institute pays nobody. It is an honorary
15 body.

16 Q. It's an honorary body, is that what you said?

17 A. Yes. There's nobody -- not even myself.

18 Q. Got it.

19 A. Nobody has got a payment.

20 Q. Okay.

21 A. The reason, there's no money, anyhow.

22 Q. Okay. I'm going to read a portion. And I'm
23 happy to hand this to you, but I know maybe it will be
24 easier if I read it and you can tell me if you disagree
25 with it.

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1 yes or no.

2 Q. Okay. Well, I can put this on the record. I
3 don't know that we need to mark it. But plaintiffs'
4 documentation production pages 68 and 69 are pages from
5 this book. The page numbers out of the book are 184
6 and 185. And I want to read you a passage from 186 --

7 A. Please.

8 Q. -- that, obviously, is a continuation of the
9 point from the page before, and just see if you agree
10 with it.11 "Santilli's investigations have placed him
12 squarely in opposition to the godfathers of
13 conventional wisdom. All this has put him at a grave
14 disadvantage in the scientific world."

15 Do you agree with that?

16 A. Yes, indeed.

17 Q. And he goes on to say -- a attribute to you,
18 Mrs. Santilli -- "There seems to be little doubt that
19 without the unswerving support of his wife, he would
20 not have survived."21 A. That is also true. I will have -- I would
22 have left -- that's why we've been married for over
23 52 years, have a mutual loyalty, because I would not
24 have survived without my wife's support. And with my
25 -- I should say we would not be here without my wife's

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1 On his -- inside the front cover, he has a
2 quotation from J. Robert Oppenheimer, and I just want
3 to see if you agree with this.4 Oppenheimer says, "There must be no barriers
5 for freedom of inquiry. There is no place for dogma in
6 scientists" -- "in science. The scientist is free and
7 must be free to ask any question, to doubt any
8 assertion, to seek for any evidence, to correct any
9 errors."

10 Do you agree with that?

11 A. I agree fully. I didn't know the quotation,
12 but now that I hear it, I agree fully.

13 Q. Okay.

14 A. But this -- but Oppenheimer refers to serious
15 scientific inquiry --

16 Q. Okay.

17 A. -- not this vulgar accusation by a
18 nontechnician throwing judgment, vulgar and sludge on
19 serious scientific research, like the case of Frank
20 Israel and Pepijn van Erp.21 Q. You gave us some pages from this book in
22 discovery, didn't you?

23 A. Honestly, I do not remember.

24 Q. Okay.

25 A. But if you refresh my memory, I will tell you

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1 support and dedication to the United States of America.
2 We filed this lawsuit in support to defend freedom of
3 speech and of research in the United States of America.
4 Remember, we will never get one penny of payment from
5 Defendant Israel and van Erp, never. So we're spending
6 money. We believe that what we are doing, we are doing
7 for the United States of America.

8 Q. I think we're on --

9 A. The --

10 Q. Sorry. I'm going to mark an exhibit. Please
11 finish.

12 A. That's okay.

13 (Exhibit V51 was marked for identification.)

14 BY MR. LAKE:

15 Q. Okay. Exhibit 51, please, if you would take
16 a look at this and see if you recognize it. I will
17 tell you these are pages from the Institute for Basic
18 Research website.

19 A. Let me check.

20 MRS. CARLA SANTILLI: This is the faces,
21 famous faces. It was a joke. It was a joking
22 thing. Okay.

23 THE WITNESS: Yes.

24 BY MR. LAKE:

25 Q. Do you recognize that document, Dr. Santilli?

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- 1 A. Oh, yes, yes, I do. A happy moment of my
2 life.
3 Q. A beautiful place, and it looks like you're
4 having fun, correct?
5 A. Yes, I am --
6 Q. Yeah.
7 A. -- indeed, very much so.
8 Q. And just so the record is clear, you're
9 making faces at the camera as you're asked about
10 various scientific concepts, right?
11 A. That is very true.
12 Q. And it looks like from the faces you're
13 expressing a little skepticism on some of these ideas,
14 right?
15 A. That is very true.
16 Q. Yeah.
17 Expansion of the universe, skeptical of that,
18 right?
19 A. Indeed, I am the author -- I am the author of
20 measurements that establish, indeed, that the universe
21 is not expanding. I'm internationally known for this.
22 Q. A couple --
23 A. It's called iso redshift measure on earth.
24 Q. A couple of pages later, the heading at the
25 top says, "Professor Santilli, what do you think of the

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- 1 avoiding the truth. Is that a fair paraphrase?
2 A. It's deeper than that.
3 Q. Okay.
4 A. It's basically back to the Dark Ages.
5 Q. Okay. And, specifically, you used it in the
6 context of science, people who are avoiding the truth
7 and looking backwards rather than forward in science?
8 A. Yes, that's correct, yes.
9 Q. Okay. All right. Are you familiar with an
10 Institute for Basic Research article about the
11 denunciation of obscurantism at CERN?
12 A. Oh, there's been so much against CERN, I
13 don't remember.
14 Q. Okay.
15 A. But I wouldn't be surprised that the members
16 of our institute have expressed the view that there is
17 an obscurantism at CERN.
18 Q. Okay.
19 A. Actually, I expect it to be very much the
20 case.
21 Q. Let me show you Exhibit 52 and see if that
22 helps, if that's familiar to you.
23 A. Yes, this is our url. And I need help to
24 identify what this is all about.
25 Q. Sure. I'm not going to ask you in detail

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- 1 Big Bang?" And you're making a face that, to me,
2 suggests maybe some truth but not entirely. Correct?
3 A. That's the same for all -- everything on the
4 edge of science is applicable at the edge of science.
5 Q. Okay. So you're skeptical of the Big Bang
6 theory?
7 A. It's part of the expansion of the universe,
8 which has been proven not to exist.
9 Q. Okay. And we could go through some others,
10 but, essentially, you're making faces at ideas in
11 science that you are skeptical about?
12 A. I have received so many e-mails of
13 appreciation and praises for those faces that you don't
14 know.
15 Q. Okay.
16 A. I don't have them with me, and I don't care.
17 Q. That's fine. Thank you.
18 (Exhibit V52 was marked for identification.)
19 BY MR. LAKE:
20 Q. I have learned a new word in this case,
21 Dr. Santilli -- and I thank you for it -- obscurantism.
22 A. Obscurantism.
23 Q. Obscurantism. Thank you for helping me on
24 the pronunciation.
25 As I understand that, it means sort of

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- 1 about it.
2 A. Just a moment. Let me look.
3 (An inaudible discussion between Mr. and
4 Mrs. Santilli.)
5 THE WITNESS: Yes. The most important -- I
6 think the most important part is this testimony --
7 I remember this. This is, indeed, a document of
8 the Institute of Basic Research, of which I am the
9 president. And this is the case of, indeed, the
10 case of a -- of a -- of a publisher. This is the
11 testimonial -- this is a picture of the -- my wife
12 and I, we founded the Institute for Basic Research
13 after I left Harvard, and we went --
14 THE REPORTER: After you left what?
15 THE WITNESS: Harvard University. Thank you.
16 Ask me any question, please.
17 THE REPORTER: Thank you.
18 THE WITNESS: And if I move too fast, please
19 let me know.
20 And this is called the Prescott House, within
21 the compound of Harvard University. My wife and
22 I -- actually, we purchased this property. And it
23 became the location of the Institute for Basic
24 Research.
25 And this is -- and there was a visitor that,

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1 indeed, was a witness of an attack, including life
2 threats against me. And it happened to be
3 [inaudible], if I remember correctly. And -- and,
4 so, yes, this is -- unless I check page by page,
5 but it looks like an official document of the --
6 of the Institute for Basic Research.

7 Any questions, please?

8 BY MR. LAKE:

9 Q. Yes, please.

10 On that page you've pointed out to us, the
11 one just before the photo of the house at Harvard, the
12 life threat you're talking about there, do you recall
13 one of the two Israelis yelling at you, "Unless you
14 stop your work against Einstein, we will kill you"?

15 Is that the threat?

16 A. I don't remember the exact words. That, I do
17 not remember. Can you read me what is written there?

18 Q. Yes, please. If you'll turn to the page with
19 the house --

20 A. I don't -- I don't read anyhow.

21 Q. Oh, okay. Sorry. But the letter you were
22 referring to, to Ms. Fleming -- Ms. Fleming, who, I
23 guess, worked for the institute?

24 A. Was the secretary.

25 Q. Was the secretary at the institute?

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1 what is considered to be just ordinary research, so I
2 was just out of my wits. I was disgusted.

3 Q. Okay. And the -- so -- and you would say, of
4 those people who were -- who were attacking you, that
5 they made life threats to Professor Santilli, correct?

6 A. I do not remember. It was too emotional. I
7 don't have any record, so I cannot prove it. So I
8 think the question is insidious, because I have no tape
9 recording of the meeting.

10 Q. Okay.

11 A. So it can damage you.

12 Q. Yeah.

13 A. Unless you have evidence.

14 Q. I'm asking you what happened. I wasn't
15 there.

16 A. But it depends on the emphasis, you know.
17 Unless you have evidence of something, be careful.
18 That's my advice. And then you can act in any way you
19 want.

20 Q. Okay. What else do you recall about that
21 incident?

22 A. I was just out of my wits, because, you know,
23 I am a scientist, and I don't see any -- a lot of
24 Einstein -- one of the greatest supporters of Einstein,
25 that's me. And so -- but -- so I don't remember. When

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1 A. Yeah.

2 Q. Okay.

3 Says -- this is on page Bates No. VAN2176.
4 "At one point I heard clearly one of the two Israelis
5 yelling to Professor Santilli --

6 A. This is the guy, not me. This is --

7 Q. I understand. This is a letter from someone
8 else.

9 A. This is -- I went -- my recollection is it
10 was an eyewitness in the entrance. All of the
11 institute was listening to the guys attacking me
12 inside.

13 Q. Okay.

14 A. So it's not mine.

15 Q. I understand, yeah. The witnesses is writing
16 to Ms. Fleming.

17 A. That needs to be clarified in the record.

18 Q. Yeah.

19 "At one point I heard clearly one of the two
20 Israelis yelling to Professor Santilli, 'Unless you
21 stop your work against Einstein, we will kill you.'"

22 I just ask if that's what you recall
23 happening?

24 A. To my recollection, it was a very emotional
25 moment, because the guy was attacked by three guys for

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1 I see, you know, the control of the totality of the
2 universe by a very limited theory by Einstein, I get
3 very upset, and I don't remember anything.

4 Q. Okay. Did you approve the publication of
5 this article on the IBR website?

6 A. I don't even remember the -- I don't even
7 remember how it appeared. There was an exchange of
8 many people. Many people could have -- it was done by
9 the secretary. There are lots of exchanges there, so
10 it's kind of a blog.

11 Q. Okay. The --

12 A. A blog.

13 Q. Yes.

14 A. It was kind of a blog in which several of
15 those appear, so --

16 Q. And as president, did you approve posts?

17 A. Very liberal.

18 Q. Okay.

19 A. Some of the things appear there were put by
20 the secretary.

21 Q. Okay.

22 A. I don't care to look at them.

23 Q. Who was --

24 A. Until I believe that the United States of
25 America -- we have a democracy in the United States of

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1 America. Or some information should be suppressed to
2 defend, clearly, anti-American interests, because
3 that's what is at the bottom of this lawsuit. We are
4 filing, by paying to say our thanks to America, who has
5 been generous to us. And without any expectation that
6 we will never get one money or paying back, because we
7 know Frank Israel and Pepijn van Erp, even assuming we
8 win the lawsuit, they would never pay us one penny.

9 Q. The first nine pages of Exhibit 52 are
10 single-spaced. It looks like a letter from Pamela
11 Fleming.

12 A. It's a former secretary.

13 Q. Okay. And when you're saying "secretary,"
14 are you saying a secretary in the corporate sense or
15 are you saying an administrative assistant?

16 A. We don't have those distinction.

17 Q. Well, what were her duties?

18 A. I was traveling most of the time. She was
19 doing everything.

20 Q. Okay. Fair enough. And --

21 A. I do not accept a distinction. It has no
22 value --

23 Q. Okay.

24 A. -- within a formal institute such as ours
25 without any budget, no money.

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1 Q. Dr. Santilli, the last paragraph of the
2 denunciation letter, it's on page Bates No. 2155.
3 Right before Pamela Fleming's name as spokesperson, the
4 paragraph says, "Technical questions" -- I guess about
5 the letter -- "should be addressed to Professor R.M.
6 Santilli at the e-mail basicresearch@ibr.org."

7 So would you have been the right person to
8 contact for technical questions about this
9 denunciation?

10 A. Yes. And when I received those questions, I
11 answered them with no problem whatsoever. I provided
12 hundreds of answers through the years.

13 Q. Okay. And then the next sentence says,
14 "Contributions to this blog should be submitted to the
15 e-mail luca@scientificethics.org, attention to Luca
16 Petronio, the editor of the blog who acts following
17 Wikipedia rules."

18 You've already told me there was not a person
19 Luca Petronio; that referred to the committee as a
20 whole?

21 A. That is correct.

22 Q. Okay. So did --

23 A. An international committee of scientists --

24 Q. Okay.

25 A. -- defending the freedom and the dignity of

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1 Q. The denunciation, the first nine pages of
2 this exhibit, is addressed to three, it appears to be,
3 directors at CERN. And I'm just wondering who wrote
4 those nine pages, that denunciation? Again, it's
5 signed "Pamela Fleming, spokesperson."

6 A. I don't --

7 Q. Do you know if she wrote those personally?

8 A. Not necessarily. She might have received the
9 messages, requests from other scientists. What I would
10 want to be -- what I want to be on record is that I and
11 my wife have a number of supporters all over the United
12 States of America, as well as all over the world, for
13 this fight for scientific freedom of thought. That is
14 much bigger than what you can think of.

15 Q. Sure.

16 A. But most of them cannot talk because they
17 have -- they have a position in the university and they
18 don't want to lose the job.

19 Q. These --

20 A. See, for me to fight for America and fight
21 for new knowledge, I had to leave Harvard. If I had
22 compromised in controlling knowledge, I would still be
23 at Harvard. I have much -- I have much more
24 qualification and publications and books than any of my
25 colleagues.

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1 research --

2 Q. So --

3 A. -- against strictly anti-American interests.

4 Q. Okay.

5 A. Strictly anti-American.

6 Q. And did you use the e-mail address
7 luca@scientificethics.org?

8 A. Whenever I wanted -- whether it's Luca,
9 that's the e-mail that I used, yes.

10 Q. Well, when you wanted to go as Luca, who --
11 you mean the rest of the committee?

12 A. Well, maybe the answer, maybe, is unknown.
13 Since I left --

14 Q. Right.

15 But when you were involved, would you have
16 used the e-mail address Luca?

17 A. I'd have to check, because --

18 Q. Okay.

19 A. I'd have to check. We're talking many years
20 ago. In any case, I don't think it will have any legal
21 value. I don't know whether -- you don't need legal
22 advice from me, but we're not talking several years
23 ago. I don't -- assuming that, I don't know whether --
24 what's the legal value, anyhow.

25 Q. Right.

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1 Well, this denunciation was dated June 1,
2 2014. And as we've discussed, it says --
3 A. I had left --
4 Q. -- you should --
5 A. I had left the committee many years before
6 that.
7 Q. Well, then, why does the document say
8 technical questions should be addressed to you?
9 A. I'm sorry?
10 Q. This letter says, "Technical questions should
11 be addressed to Professor R.M. Santilli."
12 A. Yes. I accept a technical question by
13 anybody.
14 Q. So you continue to be involved with the
15 institute --
16 A. For the technical -- for the -- well, I'm the
17 president of the institute, still am now.
18 Q. Right. Well, a minute ago --
19 A. I accept --
20 Q. -- you said you had left. That's what I'm
21 trying to get straight.
22 A. I accept -- no. I kept my -- I still am now
23 and plan to remain president until the end of my days.
24 Q. Okay.
25 A. But -- however, we're talking about technical

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1 questions. Normally, I respond to technical questions
2 and leave other questions to friends and associates.
3 Incidentally, for your knowledge, it is -- my
4 recollection is that this intervention, since you
5 raised this issue, the author of this -- the author of
6 this -- the author of this was a visitor. And the
7 visitor -- I even forgot his name now. I have to look
8 at the record. There have been so many of these people
9 in my life. But besides, this is an e-mail that he
10 sent, so -- of a blog that I was not handling all the
11 time, 100 percent of the time.
12 But my recollection is that -- is that in the
13 case of my death, he will -- he will render to the
14 public all these proceedings in the country where he
15 has --
16 THE COURT REPORTER: Where what? I'm sorry.
17 THE WITNESS: He will render -- to my
18 recollection, he will render public on the country
19 the information pertaining to these efforts of
20 which he was an eyewitness in the whole -- in the
21 whole of the Institute for Basic Research without
22 being heard by the people inside.
23 For the people inside, there was myself and
24 there were three individuals that I -- that I
25 cannot identify, in any case. Simply, they

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1 were -- they were attacking me for my research.
2 That's all -- I became very emotional because
3 I'm -- I became a citizen. I come from a rich
4 Italian family, and I became a citizen of the
5 United States of America because of love for the
6 country.
7 BY MR. LAKE:
8 Q. Let me ask you about the attacks you're
9 talking about. As a result of those attacks -- well,
10 as part of those attacks, people have labeled you a
11 fringe scientist, correct?
12 A. No.
13 Q. No one has ever called you a fringe
14 scientist?
15 A. Many times --
16 Q. Okay.
17 A. -- but not because of that.
18 Q. Oh, okay.
19 A. They call me -- usually, this Pepijn van Erp
20 and many others, they call -- those are usually non --
21 non -- nonscientists or fanatic -- fanatic -- let me
22 back up. Let me rephrase the sentence.
23 Q. Okay.
24 A. This -- for your own interests, for
25 whatever -- we're talking about science, so whatever

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1 the interest.
2 We are living in an historical moment in
3 which the Einstein theory that are incontrovertibly
4 valid -- the Einstein theories that are inconvertibly
5 valid under the conditions stated by Einstein, we're in
6 a historical period to see whether those conditions
7 also apply for -- also -- sorry. Sorry.
8 Those theories also apply for conditions
9 dramatically different than those stated by Einstein.
10 And there is a clash of historical proportion. There's
11 a group of people, mostly American -- I feel myself --
12 in which we make a pledge. We make a big -- that's why
13 there is this -- that's why we filed this lawsuit,
14 because it is essential for the future well-being of
15 the United States of America, the country that both my
16 wife and I we love and we pay lots of money without
17 expecting one penny in advance without -- one penny in
18 return; that's just an indication of our commitment, my
19 wife, Carla Santilli, and me to the country, the
20 country we love. We don't know whether -- whether we
21 have to go beyond -- we have to go beyond -- I have to
22 take a little --
23 Q. Dr. Santilli, let me ask you a question with
24 regard to being labeled a fringe scientist.
25 You would say that you don't get the respect

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1 you deserve as a scientist?
 2 THE WITNESS: Attorney Parrish, I may request
 3 that -- I am 83 years old. May I request a little
 4 break?
 5 MR. PARRISH: As long as there's not a
 6 pending question, then we can have a break, or if
 7 Mr. Lake allows you.
 8 THE WITNESS: Because I'm starting to feel
 9 tired --
 10 MR. PARRISH: Okay.
 11 THE WITNESS: -- emotionally. I'm mentally
 12 tired.
 13 MR. PARRISH: Do we want to do -- can we do a
 14 lunch break so he can have some time? Or do
 15 you -- are we not doing lunch or -- what's with
 16 that?
 17 MR. LAKE: Why don't we go off the record.
 18 THE WITNESS: Or I can -- I can walk.
 19 THE VIDEOGRAPHER: At 12:15 p.m. we are off
 20 the record.
 21 (A recess was taken.)
 22 THE VIDEOGRAPHER: At 12:24 p.m. we are on
 23 the record. This deposition is to be continued at
 24 12:24 p.m. We are going off the record.
 25 (Deposition adjourned 12:24 p.m.)

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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 RUGGERO 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
 14
 15
 16
 17
 18
 19
 20 _____
 21 Aaron T. Perkins, RMR, CRR, CRC
 22 Notary Public - State of Florida
 23 My Commission Expires: 3/1/2020
 24 Commission No. FF966216
 25

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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 RUGGERO 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 attorney or counsel connected with the action, nor am I
 17 financially interested in the action.
 18
 19 Dated this 3rd day of May 2018.
 20
 21 _____
 22 Aaron T. Perkins, RMR, CRR, CRC
 23
 24
 25

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1 SIGNATURE PAGE
 2
 3 Please attach to the deposition of RUGGERO SANTILLI
 4 taken on April 16, 2018, in the case of RUGGERO
 5 SANTILLI and CARLA SANTILLI and PEIJN VAN ERP, et al.
 6
 7 PAGE LINE CORRECTION AND REASON THEREFOR
 8
 9
 10
 11
 12
 13
 14
 15
 16
 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 RUGGERO SANTILLI DATE
 23
 24 _____
 25 WITNESS TO SIGNATURE DATE