

AFFIDAVIT OF SHAWN ROBOTKA

STATE OF FLORIDA

COUNTY OF MONROE AND BROWARD

PERSONALLY, came and appeared before me, the undersigned Notary, the within name Shawn Robotka, who is a resident of Monroe County, State of Florida, and makes this his/her statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his/her knowledge:

1. July 15, 2016: Emilie Voissem made me aware that Peter Sotis had directed her to find a way to ship the order for Osama Bensadik to Libya. This was the first time I had become aware that Peter Sotis was doing business with Libya. Emilie was concerned because she did not think we could ship to Libya and Peter Sotis was insistent this larger order be shipped quickly. After some investigation, I directed Emilie Voissem to contact the Commerce Department regarding export of specialty items and President Obama's US export directive. Exhibit A, 4 pages.
2. July 18, 2016: I spoke with Peter Sotis regarding the order for Osama Bensadik and informed him of the Presidential export directive. I also informed Peter Sotis that Emilie had contacted the commerce department to find out what could be done. Peter Sotis was not happy when I told him we could not ship to Libya. I asked Sotis if he knew this was where Osama Bensadik wanted to have the equipment shipped? His response was it does not matter as long as the money clears the account. On July 30, 2016 Peter Sotis sent out an email to myself and Emilie Voissem acknowledging the federal restriction to ship to Libya. Exhibit A 1, 1 page.
3. August 4, 2016: Brent Wagner from the Department of Commerce came to Add Helium and informed us that rebreathers are considered a controlled item and, must get approval from the department of Commerce before being exported from the United States. Wagner stated that in the case of Libya he was not aware of any shipments that would be allowed. Brent Wagner informed us that because we are aware of the final destination being Libya we could not ship to other locations outside the US such as neighboring countries. This is a practice referred to as transshipment and is illegal. Those present at the meeting were Emilie Voissem, Deb Wesler and myself. Exhibit B, 1 page

4. August 4, 2016: after the meeting with Brent Wagner. Peter Sotis came out of his office and I introduced Brent Wagner to Peter. Wagner gave Sotis a brief overview of the meeting in the parking lot. Sotis asked what would happen to the money and equipment. Wagner informed Sotis that in these types of situations the items would be seized and held. The Department of Commerce would then wait for the buyer to contact Commerce Department regarding their shipment. If the buyers are not legitimate they would most likely not make contact and simply take the losses of the equipment and the money. Add Helium would be allowed to keep the funds and the equipment would be returned to Add Helium.
5. August 4, 2016: I informed Peter Sotis of the specifics of the meeting with Brent Wagner and directly told Sotis that Add Helium was to hold the equipment purchased for Osama Bensadik until we received permission to proceed from Brent Wagner. Sotis: enquired how long that would be. I told him I did not know but he could ask Wagner. Sotis stated he did not want to get involved and would have Emilie Voissem find out. Sotis also asked about shipping to a different country. I informed Sotis that would be considered transshipment and was illegal. Sotis then stated Add Helium will not get the final payment from Osama until we can verify a shipment date, and Add Helium needed the money. I told Peter Sotis we needed to be patient and follow Wagner's Instructions.
6. August 4, 2016: Peter Sotis came to my office and closed the door. Sotis stated he saw an opportunity to get full payment from Osama and Mohammad and to keep the money and equipment which we could resell. I told Sotis that these were Federal agents and this was serious. I told Sotis that I was more concern about the damage this type of equipment could facilitate if in the wrong hands. I always thought it was odd Osama Bensadik wanted the military spec dive propulsion vehicles designed to carry hundreds of pounds of heavy equipment. Sotis stated that is what he liked about me I kept him honest. Sotis then left my office.
7. August 17, 2016: Peter Sotis, Emilie Voissem, and I had a teleconference with Brent Wagner who informed us the Department of Homeland Security investigation in to Osama Bensadik showed Osama had a militant background with terrorist affiliations. Wagner emphasized that the equipment was not to be shipped. We were told to hold all equipment, until seized by the Department of Homeland Security. Wagner requested all shipping documents and any names involved with the Osama Bensadik training and purchases. Exhibit C, 1 page

8. August 24, 2016: Brent Wagner from the Department of Commerce and Special Agent Andrew Villanueva from the FBI came to a scheduled meeting at Add Helium. Attending the meeting was Emile Voissem and myself. Sotis was intentionally absent, stating that he did not think much of Special Agent Wagner. During the meeting Wagner confirmed the equipment was going to be seized. I asked him how does this process work? Wagner stated they would come to Add Helium and pick up the crates and transport them to a holding facility. I looked at Emile Voissem and she appeared to be distressed. When I asked Emile Voissem what was wrong she mouthed the words, "it's gone". Brent Wagner was now looking at Emile Voissem and I asked Emile again what did you say. Emile then stated with a cracked voice "the crates are gone, Peter had me ship them". Exhibit C 1, 2 pages
9. August 24, 2016: Brent Wagner immediately went to Peter Sotis's office. Wagner and Sotis started to argue. Peter led Wagner outside the building, you could hear the argument from inside the office. I asked Emile Voissem what was going on. Emile told me that Peter and she had a phone conversation with Osama Bensadik and Mohammad Zaghab on August 5, 2016 and Peter negotiated the final payment plus a \$500 dollar administration fee to ship the crates by August 9, 2016. I stated to Emile that she knew we could not ship. She said Peter Sotis told her too. Later I questioned Emile about the shipment. Emile informed me she did not want to get in trouble with Peter you know how vindictive he can be. Look what happened to Tony Land and Oliver. Emile Voissem then stated Peter had insisted that the deal made on August 5th 2016 with Osama Bensadik and Mohammad Zaghab stay between them. All Emile had to do was get the crates ready for shipment. Exhibit C 2, 3 pages
10. August 26, 2016: Brent Wagner served Add Helium with a subpoena, order for preservation of all documents, and an order stating that profits from the Libyan deal were to be held based on the fact that they were illicit funds. I was told by Peter Sotis to have Emile Voissem handle this request. I was to oversee and ensure that all documentation was provided to the Department of Homeland Security. Sotis did not want to be involved and I later discovered Peter Sotis had told Ken Wesler to go through all the documents and to dispose of any documents that showed Sotis's involvement with the Libyan shipment. Exhibit D, 3 pages
11. August 26, 2016: Mohammad Zaghab contacted Add Helium regarding notification that the shipment had been seized by Homeland Security and was being sent back to the United States. I later was informed that Peter Sotis contacted Mohammad Zaghab on a non-Add Helium cell phone. Exhibit E, 3 pages

12. August 26, 2016: I went to Peter Sotis's office regarding Osama and Mohammad and why he had Emilie Voissem ship the order to Libya. Sotis acted surprised that I was concerned or felt we had done something wrong. Sotis stated: " why do you care we got all the money and we will get all the gear back to sell again, this is great". When I pressed the issue, and stated that we were not supposed to release or ship the equipment. Wagner was very specific about this fact. Sotis stated : "they have to prove it and it will take years". Sotis then stated: " we did not ship the crates Mohammad's shipper came and picked them up. We did nothing wrong that can be proved".
13. August 29, 2016: Peter Sotis came to my office and told me he had spoken to Ken Wesler and Emilie Voissem and informed them no one was to speak to Brent Wagner or anyone without his approval. Sotis then explained to me that I had nothing to be concerned about. It's not our signatures on the shipping manifest. "They cannot tie this to us". Sotis boasted about how he was able to get payment from Osama Bensadik and Mohammad Zaghab for product that he knew was going to be seized and he could then resell. Sotis was very proud of his deception.
14. October 20, 2016: I arrived at work and was met by Ken Wesler who told me that Emilie Voissem had quit Add Helium and vacated her office. Ken Had told me that Peter Sotis had directed him and another manager Joe Coleman to speak with Emilie about a change in her position and responsibilities. Ken Wesler stated that Peter and he had discussed Emilie's employment status change and that Sotis had directed Ken to take care of it. When I spoke to Peter Sotis about Emilie leaving, his statement was, good getting rid of dead weight. Sotis could not stop from boasting stating, "I figured she would leave when we cut her pay in half. My plan is working out great. She served her purpose and now we have one less room to pay for at the DEMA show". Exhibit E 1, 3 page
15. In early November 2016: Peter Sotis called me into his office and told me he was divorcing his wife Claudia and that we must stand together and keep the company together. He stated we needed to make as much money as possible. Sotis was concerned about showing only strength at the DEMA trade show and, how any weakness would give his enemies avenues to attack his new rebreather agency. Sotis also made it clear everyone was to discredit Emilie Voissem if people asked about her. No one was to talk about Osama and the fact that we were subpoenaed and under federal investigation.

16. November 25, 2016: Peter Sotis called me from his cell phone while driving. Sotis threatened me, stating this is my company and I will make you and anyone else disappear who does not get on board. It's my way or the highway. Sotis wanted to know why Add Helium clients from the DEMA trade show knew about Emilie Voissem being forced out. Sotis then informed me that one of our managers Joe Coleman had suddenly quit for no apparent reason. I attempted to calm Sotis but he continued with threats and a plethora of discombobulated statements. Some of the statement were about his wife Claudia and how she needs to go away or just disappear.
17. Sotis continued his ranting about how the dive industry is full of idiots who don't understand business. How Paul Rainmaker at REVO and Tom Mount at IANTD allowed him to violate standards and knew how he did business but, did not care because he made them money for years. Now they were turning their backs on him. Sotis was obsessive about keeping the REVO territory in Florida. Stating: "Rob Stewart and the movie is our in. Sotis was fixated with controlling Stewart and ensuring Sotis himself was in the movie. Sotis stated: "No one else can do what I can do, no one else has Stewart. He is nothing without me".
18. Sotis told me I needed to be at the office, even though I was scheduled to be off, and that if I was not at the office he would lock me out of the building and keep all of my personal equipment. Sotis then hung up the phone.
19. November 25, 2016: When I arrived at the Office, Peter Sotis was in his office. I confronted him about his phone call and his behavior. Sotis stated we should talk about it give him a couple of minutes. When I returned Peter Sotis had left the building and his Jaguar was gone.
20. December 14, 2016: Peter Sotis came to my office and directly threatened me with physical and financial retribution. Sotis stated I needed to keep my mouth shut and not to talk about Emilie Voissem, Osama Bensadik, Mohammad Zaghab, or the Libya shipment. Sotis stated: "anyone who talks to the investigators will be fired". Sotis stated, "it will get bloody I will personally put you in the ground". Sotis asked me why I was so concerned about Libya. Stating, you don't get it, "our signatures are not on the documents I ran everything through Emilie. She will take the fall for everything. I had Ken (Ken Wesler) delete all the files on the server which we will blame on Emilie as a disgruntled employee". Ken deleted all Osama payments there is no link to us. Sotis then stated: "we can always throw them Ken for destroying documents". What part of this don't you understand? We will get to keep the funds and the equipment. We have nothing to be concerned about.

21. Sotis went on to talk about his pending divorce from his wife Claudia and getting a better model. Life was good is what Sotis said. I literally did not know what to say it was beyond bizarre. It was hard to come to terms with Sotis's manic behavior. Sotis was more than willing to do anything for his personal greed and ego. Not only did he break the law when federal Agents told him not to ship controlled military grade items to Libya. Peter Sotis knowing planned to defraud Mohammad Zaghab and Osama Bensadik a known Libyan militant who had affiliations to terrorist. Possibly placing all employees of Add Helium in jeopardy.
22. Peter Sotis knowingly planned to frame an Add Helium employee for Sotis's illegal acts. Then purposely removed any individuals or evidence that could reveal his involvement. Peter Sotis simply did not have any remorse about his actions. Sotis could only boast about his conquest. Owning Rob Stewart, Sotis's part in the movie and keeping Revo. Showing everyone that he was the authority in Rebreather training. Sotis was particularly pleased with how he maneuvered the Federal investigators and Osama Bensadik and Mohammad Zaghab against one another. Exhibit G, 1 page
23. On December 20, 2016: while at an offsite meeting I was sent a text message and informed from an Add Helium employee that the locks and security codes were being discretely changed at the Add Helium building by Ken Wesler per Peter Sotis. When I called Peter Sotis to inquire what was going on I received no return communication. Later I discovered my email, company computer access, company debit cards were no longer working. Exhibit H, 1 page
24. On December 21, 2016: I received a text message from Peter Sotis its simply read, it's up to you how this goes. Sotis refused to respond by phone or any other form of communication. Later when I went to Add Helium new signs had been put up on the building stating private property no trespassing. The doors were locked and no one would answer the doors. Peter Sotis and ken Weslers vehicles were in the parking lot.
25. December 21, 2016: 22:00 hours Peter Sotis called me on a blocked number Sotis stated: "you're a dead man I am going to kill you". " I told you this would get bloody, I am going to put you in the ground". Then hung up.

26. December 31, 2016: After a basic Forensic review of Kaizen LLC, Add Helium LLC, and all other subsidiary companies. It was established that Peter Sotis had embezzling over \$180,000.00 in 2016 with direct account withdraws, non-company based expenses, personal past debts and personal legal expenses. In direct violation of his partnership agreement. Exhibit I, 7 pages

DATED this the 12 day of October, 2017


Signature of Affiant

SWORN to subscribed before me, this 12th day of OCTOBER, 2017


NOTARY PUBLIC

My Commission Expires:

August 28, 2021

