

**PROPRIETARY INFORMATION/FOIA EXEMPT
WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390
Upon the removal of Enclosure (1) this document can be made public**

ENCLOSURE (3)

**Affidavit of Mark Geurts
President and Chief Executive Officer
Coquí Radiopharmaceuticals Corp.**



COQUÍ RADIOPHARMACEUTICALS CORP.

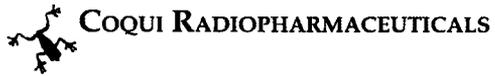
10 CFR 2.390 AFFIDAVIT OF MARK GEURTS

AFFIDAVIT

I, Mark Geurts, hereby affirm and state as follows:

- (1) I am the Chief Operating Officer of Coquí Radiopharmaceuticals Corp. (Coquí) and I have been authorized to execute this affidavit on behalf of Coquí.
- (2) Enclosure (1) to this letter contains proprietary commercial information related to the proposed Medical Isotope Production Facility (MIPF) and Coquí's business. The proprietary information includes sensitive information pertaining to the MIPF site selection process. This information should be held in confidence by the NRC and withheld from public disclosure. Upon the removal of Enclosure (1), the remainder of this letter can be made public.
- (3) In making this application for withholding of proprietary information of which it is the owner, Coquí believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC § 552(b)(4), the Trade Secrets Act, 18 USC § 1905, and NRC regulations 10 CFR §§ 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial information because:
 - i. This information is and has been held in confidence by Coquí.
 - ii. This information is of a type that is customarily held in confidence by Coquí, and there is a rational basis for doing so because the information includes sensitive business information pertaining to Coquí's site selection process for the MIPF.
 - iii. The information is being transmitted to the NRC voluntarily and in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of this information would create substantial harm to the competitive position of Coquí by disclosing information pertaining to its MIPF site selection process. Development and evaluation of this commercial information was achieved at, and disclosure could lead to additional, significant cost to Coquí.
 - vi. Public disclosure of the information sought to be withheld is likely to cause substantial harm to Coquí's competitive position and foreclose or reduce the availability of profit-making opportunities. The value of the information goes beyond the disclosure of actual information pertaining to Coquí's business, and includes substantial time and work towards developing the MIPF project, and represents significant efforts by Coquí and its associates.

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- vii. Coquí's competitive advantage will be lost if its competitors are able to use Coquí's cost estimates to aid their own commercial activities. The value of this information to Coquí would be lost if the information were disclosed to the public. Making such information available to other entities without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Coquí of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 28, 2011.



Mark Geurts