

SWORN STATEMENT
("DÉCLARATION ASSERMENTÉE")

I, the undersigned, ENRICO FRANK ANDREOLI, residing at [REDACTED]
[REDACTED], Judicial District of Montreal, Quebec, solemnly declare as follows:

1. I am the shareholder and director of Les Entreprises Canbec Construction Inc. ("Canbec");
2. The purpose of this Sworn Statement is to provide some clarification and detail in respect of various testimonies which have been delivered before the *Commission d'enquête sur l'octroi et la gestion des contrats publics dans l'industrie de la construction*.
3. In particular, I would like to respond to the four (4) potential conclusions in the April 17th, 2015 letter, that is herein attached;
1. **"D'avoir participé à un système de collusion entre les entrepreneurs à la ville de Montréal"**
4. It is my understanding that the source of this allegation is the testimony of Mr. Michel Leclerc from Construction Teramex;
5. On November 19th 2012, Mr. Leclerc suggested that the organization and/or control of public contracts for the City of Outremont and Westmount were held respectively by Canbec and TGA;
6. Although Mr. Leclerc was unable to comment on how the "rotation" of contracts was organized or controlled, he maintained that the principal distribution of those contracts was determined by those 2 companies;
7. I am submitting that not only did I or Canbec not have any form of "control" over the public contracts issued by the City of Outremont, but that in the span of over 30 years, Canbec was awarded 3 or 4 contracts from the City of Outremont;

8. The information regarding the number of contracts obtained by Canbec, from the City of Outremont, is clearly documented and should be accessible and verifiable;
9. Secondly, Mr. Michel Leclerc alleged that two separate meetings were held for the purposes of establishing a system of collusion regarding contracts for parks with the City of Montreal.
10. Mr. Leclerc suggested that the first meeting was held at the offices of Mivela Construction and that a second meeting was held in a restaurant on St-Jacques Street West;
11. Although I know Mivela Construction and have visited their offices, I have never been to Mivela Construction to attend meetings other than meetings directly involving existing contracts between Mivela and my companies;
12. Also, I have never attended any meeting such as the one suggested by Michel Leclerc, in any restaurant, including a restaurant on St-Jacques Street;
13. Furthermore, and given that I am the principal and sole shareholder of Canbec, no other person employed by Canbec, or with my authority and consent, attended a meeting at Mivela Construction or in a restaurant on St-Jacques Street West, for any "collusionary" purpose;
- II. **"D'avoir entretenu des liens de proximité avec des fonctionnaires de la ville de Montréal avec l'objectif d'être avantagé"**
14. I have never had a friendship with or close ties to any civil servant from the City of Montreal, for the purposes of obtaining any benefit;
15. With respect to the testimony of Mr. Robert Marcil, rendered on the 25th and 26th of February 2013, I submit as follows:

16. I know Mr. Marcil from the time Mr. Marcil worked for a corporation called Beauval Construction;
17. I have attended, on a number occasions, a hunting trip with Mr. Marcil and other people involved in various industries, where every member of the hunting party is and was required to pay their own expenses;
18. Aside from and including these hunting trips which Mr. Marcil and I both attended and which began prior to Mr Marcil's employment with the City of Montreal, I have never had any meetings with or tried to influence Mr. Marcil in any way, in order to obtain a benefit for myself or for Canbec;
19. Furthermore, and as was confirmed by testimony before the Charbonneau Commission, I have never had any dealings with any civil servants who answered to Mr. Marcil, namely Mr. Luc Leclerc and Mr. Gilles Surprenant;
20. However, and with respect to the testimony of Luc Leclerc delivered before the Commission on the 1st of November 2012, I wish to state the following:
21. Mr. Luc Leclerc stated that he "believed" that on one occasion during a lunch at "La Cantina" restaurant where he was in the company of another person, that I would have sent a bottle of wine to their table;
22. I state that at no time did, I ever send a bottle of wine or any other gift to Mr. Luc Leclerc.
- III. **"D'avoir été en relation avec des membres du crime organisé traditionnel italien, notamment Francesco Arcadi, Rocco Sollecito et Paolo Renda"**
23. With respect to the above statement, I understand that the source of this allegation is the testimony of Mr. Eric Vecchio, delivered on the 26th of September 2012;

24. During the mid to late nineties, and while Canbec proceeded to honor its snow removal contracts with the City of Montreal, Mr. Eric Vecchio had become accustomed to stopping the Canbec convoy while it was passing on de La Commune Street;
25. Although Mr. Vecchio would remain polite during his interventions, tensions arose between Mr. Vecchio, other officers, and myself as there were disagreements in regards to our respective interpretation of the City dumping permissions issued to Canbec at that time;
26. Further to these disagreements, I complained to City officials who responded by convening me to a meeting with a superior officer of the Montreal Police responsible for Ville-Marie Burrough;
27. Although our disagreements were never fully resolved, we agreed to try to work together;
28. It was Mr. Vecchio who commented on a video presentation taken at Café Consenza on Christmas Eve, in 2005;
29. Although Mr. Vecchio commented on the manner in which I entered the Café and greeted various individuals, I wish to provide the following facts:
30. The Café Cosenza is a Café found in the same shopping complex as a butcher shop which my family and I have frequented for over 28 years;
31. On December 24th 2005, I went to the AGA butcher shop, owned by Carmello Gatto, to buy meat;
32. As Mr. Gatto's suggestion, I agreed to have a cup of coffee at the Conzenza Café;

33. The 3 individuals mentioned in the heading and referred to by name by Mr. Vecchio, were in the Café that afternoon;
34. I knew Paolo Renda from the time I began working in the construction industry, as a summer student, at the age of 17.
35. At the time I worked for a small excavation company that had nothing to do with Mr. Renda.
36. I have had no business dealings with and no direct social relationship with Paolo Renda;
37. On December 24th 2005, Mr. Renda approached me on a personal matter regarding a snow removal issue which he had in regards to a building which he owned;
38. When he asked if I could help him minimize the size of the snow bank left by the City snow removal crews after each winter storm (in order for his tenants to have access to the parking area), I agreed to look into it and took out a piece of paper in order to note the address;
39. When Mr. Renda gave me the address and I realized that his building was not in the area serviced by Canbec equipment, I told him that I could not be of any help to him;
40. I Know Mr. Renda as someone who has been involved in the construction industry ever since;
41. As concerns Mr. Francesco Arcadi, I wish to state the following:
42. As much as I consider Mr. Paolo Renda to be an acquaintance, I consider Mr. Arcadi to be a lesser acquaintance, with whom I did not have any social relationship;

43. I have never had any business dealings of any kind with Mr. Francesco Arcadi and I know him because he was a client at the "La Cantina" restaurant operated by my brother-in-law Federico Del Peschio;
44. As regards Mr. Rocco Sollecito I am stating that I never had any direct social relationship with him;
45. I have never had any business dealings with Mr. Sollecito;


IV. "D'avoir participé à une rencontre en vue d'organiser un cartel dans le secteur des parcs"

46. I would ask that you refer to my statement in Part I, as it also pertains to the above affirmation;
47. As I have already stated, I have never participated in any meeting or meetings for the purpose of establishing a cartel or a system of collusion in order to obtain public contracts;
48. All the facts mentioned in this statement are true and to the best of my knowledge.


ENRICO FRANK ANDREOLI

Solemnly declared before me

at MONTREAL, this 7th day of May 2015


Commissioner of oaths
for the province of Quebec

#142,627

