

**SWORN STATEMENT**  
(«DÉCLARATION ASSERMENTÉE»)

I, the undersigned, LUCIANO CATALOGNA, residing at [REDACTED] Québec, [REDACTED], solemnly declare that:

1. I am director of the Catalogna & Frères Ltée corporation ("Catalogna");
2. The purpose of this affidavit is to provide some clarification and additional detail in respect of various testimonies which have been delivered at the *Commission d'enquête sur l'octroi et la gestion des contrats publics dans l'industrie de la construction* hearings in order to enable the Commission to draw conclusions and inferences that are based on true and verifiable facts;
3. The Catalogna corporation was founded by three brothers. The first having died in 1997, the second in 2003 and the third is still alive and retired from the construction business in 1991;
4. With respect to the testimony of Mr. Jean Théorêt, I wish to make the following statements:
  - a) The Catalogna corporation, the Catalogna brothers or any of its shareholders or directors have never contacted, directly or indirectly, Mr. Jean Théorêt;
5. With respect to the testimony of Mr. Michel Leclerc, I wish to make the following statements:
  - b) The Catalogna brothers or any of its shareholders or directors have never spoken to Mr. Michel Leclerc;
6. With respect to the testimony of Mr. Pierre Lampron, I wish to make the following statements:
  - a) The Catalogna corporation was founded in and remains physically based in Lachine;
  - b) Since the Catalogna corporation is physically based in Lachine (machinery, employees, materials, etc.), the corporation's business strategy is to bid on contracts with which it is most familiar in order to ensure it may carry out its work at the lowest cost;
  - c) In fact, between the years 2006 and 2010, the Catalogna corporation did bid on 28 contracts in Lachine (rather than 11);
7. All the facts mentioned in this sworn statement are true and to the best of my knowledge.

AND I HAVE SIGNED this day of 27<sup>th</sup> day of April 2015.

[Redacted signature area]

Luciano Catalogna

Affirmed before me  
in Montreal, this 27<sup>th</sup> day of April 2015.

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Commissioner for Oaths

