

SWORN DECLARATION

I, the undersigned, Giorgio Tartaglino, having my professional domicile at [REDACTED], solemnly affirm as follow:

1. For over forty (40) years, I have been doing business in Montreal in the real estate area;

2. Amongst others, for many years, through corporations, I owned office buildings located at 550 Sherbrooke Street West, 606 Cathcart Street and 8955 St-Laurent Blvd, in Montreal;

A. TONY MAGI

3. Early in 2000, I was interesting in acquiring a parcel of land located on the corner of Drummond and Maisonneuve streets in Montreal (the « **Maisonneuve Land** »);

4. However, I was informed that the owner, Canderel inc., was about to sell it to a corporation owned by Tony Magi (« **Magi** »), somebody I did not know before;

5. I decided to seek information about Magi and learned that he was in the real estate field with a good reputation and well respected in the business community;

6. A meeting was organized with Magi, during which he told me that he was in the process of purchasing a parcel of land located on the corner of René-Lévesque Street between Drummond and the De la Montagne Streets (the « **René-Lévesque Land** »);

7. We then agreed to purchase together both the Maisonneuve Land and the René-Lévesque Land through a corporation;

8. However, shortly thereafter, Magi defaulted on his commitments and I had to introduce proceedings against him;

9. Those proceedings culminated in 2003 with me, through corporations I control, obtaining full ownership of the René-Lévesque Land and the Maisonneuve Land;

10. Not at any moment, during the above period, was I informed or had any suspicions that Mr. Magi could have any particular or unadvised acquaintanceship;

B. TONY RENDA

11. Construction Tony Renda inc. is a company specialized in the construction of office space for various tenants and was a main contractor for SNC Lavalin inc.;

12. During the period of 1986 to approximately 2000, as property owner, we used Construction Tony Renda inc. as one of the contractors for work required in our buildings, 550 Sherbrooke Street West, 606 Cathcart Street and 8955 St-Laurent Blvd, in Montreal;

13. In 2001, as we wanted to start the construction on the Maisonneuve Land, we hired Mr. Tony Renda as a consultant for the construction portion of the project to obtain quotes and negotiate

contracts;

14. During that period, Mr. Renda purchased some parcels of land in the Rivière-des-Prairies area and was looking for financing in order to develop small condominiums projects on these parcels of land. Therefore, instead of only lending funds, we decided to become partner and formed GTR Construction inc.;

15. GTR Construction inc, built condominiums projects of 15 to 25 units per project for a total of approximately 75 units;

16. A few years later, Mr. Renda accepted a consultant mandate from Le Crystal, one of our main competitors and we decided to terminate Mr. Renda's consultant mandate with us;

17. Not at any moment, during the above period, was I informed or had any suspicions that Mr. Renda could have any particular or unadvised acquaintanceship;

C. 1000 De la Commune

18. In the early 2000's, I was informed by Magi of a condominiums project known as the 1000 De la Commune in Montreal;

19. However, I was never involved, directly or indirectly, in said property either for the financing of the construction or for any other reasons;

20. The facts alleged in the present affidavit are true.

AND I HAVE
SIGNED:

Giorgio Tartaglino

Solemnly affirmed before me in
, on May 12, 2015

Commissioner for oaths

Je soussigné,
Maitre Fabrice BOURCIER de CARBON
de PRÉVINQUIÈRES, notaire à NICE
(06000) 24, boulevard Victor-Hugo
certifie sincère et véritable la signature
apposée ci-dessus.
Fait à Nice, le 12 mai 2015

