

I, the undersigned, [REDACTED], domiciled and residing at [REDACTED], do solemnly affirm that:

1. I am the affiant herein;
2. That I was recruited as a confidential informant for the SQ in 1994; and by RCMP in 1995;
3. That I have been involved in various drug-related operations in my capacity as an informant;
4. That I have been involved in Aboriginal and governmental information gathering operations for public security;
5. That I have received discretionary public funds from Ministers and persons authorized on behalf of ministers for information and meetings arranged for public security concerns on and off reserves during this time; (See Exhibit A)
6. That my company did receive benefit of directed projects and funding from both SQ and RCMP in furtherance of these operations and information gathering; (See Exhibit B)
7. That based on my work and relationship with these policing agencies, I served on various committees and travelled extensively in Aboriginal communities for their objectives;
8. During 2003, I was contacted by Cpl. Daniel Beaudry to appear as a witness in the investigation against him undertaken by the SQ;
9. I appeared at the lawyer's office of Me Philip Schneider in Dorval, Quebec to be questioned by him regarding my involvement with Cpl. Daniel Beaudry; (See Exhibit C)
10. The questioning centered around his use of CPRQ, authorized and unauthorized; I was asked if I had ever asked him to use the system to inquire on any persons or vehicles;
11. A few weeks later, I was visited at my home by 2 SQ officers in furtherance of their investigation of Daniel Beaudry;
12. Of the many questions I was asked related to Mr. Beaudry, the officers also mentioned Mr. Michael Chamas and his brother [REDACTED];
13. I stated that I had not seen either of those gentlemen, who were friends of Mr. Daniel Beaudry for many years and in fact did not know where they were, if in the country any longer;
14. I am not aware of the outcome of this investigation; but in April 2005 I was contacted by Daniel Beaudry who wanted to re-introduce me to Michael Chamas;
15. Mr. Beaudry indicated that he was no longer at the Oka detachment and that he had been promoted and was working in Prevost now;
16. During his call, Mr. Beaudry asked if I would be willing to meet him for lunch and discuss the past and how each other were doing since we had last seen each other in 2003;
17. I finally agreed and we met near the end of April, 2005 in Laval, Quebec; during this lunch Mr Beaudry indicated that he had been in contact with Mr. Chamas and since he had returned from China, he would like to meet me to discuss some business;
18. I indicated that I was not interested since things had not ever worked out between us and I was not interested in going through another disaster; Mr. Beaudry implored me to give a chance to hear out what Mr. Chamas was proposing;
19. I agreed to listen and Mr. Beaudry immediately called Mr. Chamas and set up a meeting for that afternoon;
20. Mr. Beaudry had me follow him to Rosemere, Quebec and meet Mr. Chamas;
21. During the course of the discussion, Mr. Chamas explained that he had been doing business out of the country and was in fact resident overseas now; that he was travelling back and forth; and needed someone who could look after his business

interests here in Canada during his absence; that he was interested in building an alliance between Canadian business and overseas contracts and endeavors he had there;

22. Mr. Chamas also explained that he had a number of legal issues that required some assistance in obtaining representation that included a hotel matter;
23. At the end, I told Mr. Chamas that I would consider his proposal and get back to him;
24. In May, 2005 I arranged to meet with Mr. Chamas again and agree on some parameters of work and what his expectations were;
25. From time to time, I would have meetings with Mr. Beaudry and his involvement in Mr. Chamas' business interests; specifically he was looking to help his brother with his business in Laval in obtaining overseas contracts from Mr. Chamas;
26. During that time, Mr. Beaudry suggested that Mr. Chamas build his reputation in the community by participating in several activities that Mr. Chamas could sponsor;
27. These included the Torch Run 2005, a joint police force sponsored run for special olympics; and the children's softball tournament that was co-sponsored with the SQ;
28. We prepared and promoted for these events, sponsored the events with donations, and participated in each event with dinners and publicity;
29. In the business realm, we were promoting the companies in various political constituencies; and supporting various campaigns;
30. In 2005, I was also approached by certain government lobbyists and political advisors during the campaign of Mr. Harper, to be involved through sponsoring events, raising funds, and making sure that Quebec businessmen who were influential became involved in the Harper campaign for Prime Minister;
31. After Harper became Prime Minister in 2006; a situation had arisen at the time when Mr. Chamas returned from Dubai with his family in July;
32. I contacted the same lobbyists to see what could be done in regards to this situation; during this conversation on July 11, 2006; I was told that fees would have to be paid; but that the expulsion order would be suspended and a ministerial permit would be issued;
33. Several days later I received a copy of the letter sent to the Minister of Immigration attached to the emails with contact information for the lawyer to send the application for permanent residency with parameters to follow; I was also given the names and contact information of people inside the ministries to follow up with; (See Exhibit D)
34. Upon reflection of the situation, the lobbyists were interested in what business Mr. Chamas was involved in and what type of contributions he could make to the party in both financial and business (project development) concerns;
35. There were several discussions and meetings that took place over the course of that summer and fall and finally the project of the acquisition of the Laurentian Bank was discussed;
36. I presented this to Mr. Chamas, who in October, 2006 took a meeting at the family residence with Mr. Bernstein and the plans were fully developed for the approach to the project, who would be involved and the manner in which Mr. Chamas would be 'announced' by the politicians and the Prime Minister; (See Exhibit E)
37. Mr. Chamas indicated to Mr. Bernstein that certain matters would have to be looked after in terms of the government pursuit of him via Customs and Revenue; and that the Immigration matter would have to be finalized;
38. Mr. Bernstein assured Mr. Chamas that with the right team players and lobbyists everything would be looked after; that Mr. Chamas needed to concentrate on the bank acquisition and making sure the funds were of good providence;
39. The machinery started to move in putting the players in place, gathering the documentation and the funds to start the acquisition;

40. A major dinner gala was planned to be held in December 2006 to announce the project;
41. Several events occurred that interrupted that schedule and the project did not start until later 2007;
42. In October, 2007 and into December, 2007 the work was in full motion for the project and the various interests of the Canadian government and private business that would focus on overseas contracts and bringing some economic development to Newfoundland;
43. In November, 2007, I was, in the course of assisting someone to file a complaint with the police, in contact with both the RCMP and the SQ;
44. I called into the task force for fraud at the RCMP and was transferred over to an investigator who told me to contact the SQ for this; but not before asking me questions about Mr. Chamas;
45. I, during November 13-23, 2007, was attempting to contact my former handlers at the SQ. Michel Martin, (Lt. Robert Belec – now Inspector; and retired member Lt. Greg Stevens) and Insp. Jacques Beaupre; I was told to meet Sgt. Claude Condo at Parthenais;
46. On November 27, 2007 I met Sgt. Condo in the lobby of Parthenais, we discussed the current matter of a fraud complaint; and then the discussion turned to Daniel Beaudry, my time with the SQ and how I felt about how things were handled since I had left; we discussed at length the problems I had encountered working for the SQ and the threats I had received; and then Sgt Condo directly asked me about information I may have concerning the 'illegal' activities of Daniel Beaudry, he explained that everyone knew he was dirty and they wanted to 'get' him, strip him of his pension and expose the damage he had created with his illegal activities in the aboriginal community and his ties with Robert Gabriel; further he said that he finished well ending up with a successful fraud Michael Chamas and that he was living well now;
47. Sgt. Condo asked me to provide them with all the information I could concerning this and then stated that it would be better to take them all down; he suggested that it was easy to provide the means for police to charge them with current things and then bring out the rest of the past illegal activities; he suggested this using the example of illegal weapons being discovered at the residences of individuals; and that they could gain access to the homes and find illegal drugs, weapons and money; and charge them accordingly;
48. Sgt. Condo instructed me to return the following day to meet with Capt. Martin who was arranging my meeting with Sgt. Denis Gagne and Manon Bedard for the next day;
49. Sgt Condo, said: "... you know what to do, come in and call upstairs; someone will come get you..."; he gave me his card with his cellular number (See Exhibit F) and told me to think about what he had asked and that he would be available to meet me;
50. The next day, I arrived in the morning at Parthenais, gave my ID to obtain the pass, and asked the guard to call upstairs for Michel Martin; I waited for quite some time and no one came; so I went back over and asked them to call Insp. Robert Belec, who came right away; and then escorted me upstairs to meet Sgt. Gagne and Manon Bedard.
51. Following that time at Parthenais, I received a letter from the SQ concerning the complaint and I replied; (See Exhibit G)
52. I contacted Sgt. Condo and had several discussions with him concerning his requests and suggestions;
53. In January, 2008; I decided based on the information I had received from the governmental lobbyists and the police concerning Mr. Chamas and Mr. Beaudry to proceed with obtaining the firearms and to find the occasion to put them in Mr. Chamas' family residence;

- 54. I believed the information that was presented to me; and felt that it was in the best interest of everyone to "place" firearms, for which Mr. Chamas or Madame Garas did not have authorization to have, in the residence to make charges stick to him and force her removal from Canada;
  - 55. I have since learned that I was used and manipulated by the system to obtain what they could not, a criminal conviction without contrivance on their part;
  - 56. I have been shown documents at the CRA that clearly were only obtained from the search and seizure efforts of the RCMP (Meeting May 7, 2008 meeting- see Exhibit H); I have also seen the documentation obtained similarly by Immigration Canada from the same set of documents seized; used against Madame Garas;
  - 57. On December 19, 2008 I felt that I had been found out; when at the office of Mr. Chamas' lawyer, Frederic Allali, Me Allali had asked me to come to his office to discuss some pressing concerns he had following a visit he had received from an individual; Me Allali confronted me on information he had received that day from Mr. Michel Strecko who had visited his office along with another gentleman. The information was that I was working on the inside of Chamas' camp, while Mr. Strecko was working on the outside. The inference was that Mr. Strecko and myself were part of an organized 'operation' to bring Chamas to 'justice'; I emphatically denied this accusation and convinced Me Allali that I was working arduously to advocate for Mr. Chamas;
  - 58. On April 6, 2011; I received a phone call from David Bernstein, who was in the hospital at Royal Victoria; asking me to visit him, he needed to talk to me; (See Exhibit I)
  - 59. Upon arrival at his room; I saw that Mr. Bernstein was terminally ill and was suffering; he began to talk to me about our history since 1998 and all the things we had done together both in business and in politics;
  - 60. It was in this vein he discussed the mistakes he had made with me concerning Mr. Chamas; I felt that he was expressing remorse for some of his actions and the consequences of them;
  - 61. I asked him if he was talking about the money he had taken for him and his counterparts and that they had failed completely to help Mr. Chamas and his family;
  - 62. Mr. Bernstein, looking down, nodded his head and began to tear up; he explained that he really had wished that things had gone differently; I explained to him that we had done things that we should have done differently;
  - 63. I began to feel my own remorse over my actions and decided to make things right;
  - 64. I am giving this affidavit without coercion, without promise of money, without promise of immunity; of my own free will and without reservation.
  - 65. All of the statements in this Affidavit are true to the best of my knowledge.
- FURTHER AFFIANT SAYETH NOT.

AND I HAVE SIGNED, at Montreal, this  
2<sup>nd</sup> day of May, 2011

[Redacted signature]

Solemnly affirmed before me at Montreal,  
May, 2011



Commissioner of oaths for the district  
Montreal