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To the Affidavit Of

Rocco Terrigno

Sworn this 2 day of August 2017

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF (S)

TERRIGNO INVESTMENTS INC.

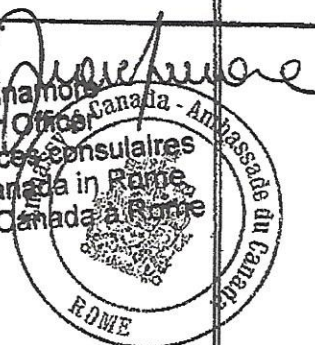
DEFENDANT (S)

JEREMY STURGESS AND JEREMY
STURGESS ARCHITECT LIMITED

DOCUMENT

QUESTIONING FOR DISCOVERY

Ms. Franca Finamore
Franca Finamore
Consular Officer
Agente de services consulaires
Embassy of Canada in Rome
Ambassade du Canada a Rome



QUESTIONING OF JEREMY HOWARD MOUTRIE STURGESS

BY MR. C.M.A. SOUSTER

HELD APRIL 19, 2017

Taken before Karoline Schumann, Official Court
Reporter, pursuant to Rules 5.26, 6.20, and 13.46 of
the Court of Queen's Bench of Alberta, at the offices
of Bryan & Company Calgary LLP, Calgary, Alberta.

1 Q Do you believe that Mike is a member of the mafia?

2 A I have no way of knowing that.

3 Q Have you, in the past, made representations to anyone
4 that you believe or have been advised that Mike may be
5 in the mafia?

6 A I have never made representations that I believe that.

7 Q But that someone else has advised you?

8 A Yes.

9 Q And who might that other person be?

10 A Do I have to answer that?

11 MR. HAGG: Yes.

12 A Councillor Farrell.

13 Q MR. SOUSTER: What did she tell you?

14 A She said that -- she cautioned me early in the process
15 of this job that she believed that Mike was involved
16 with the mafia.

17 Q And did she give you any reasons why, or was it a bald
18 statement?

19 A It was a statement.

20 Q And when did that meeting occur?

21 A It wasn't a meeting.

22 Q So tell me a little bit more about where it took
23 place --

24 A I think it probably was a telephone conversation, and
25 it was, as I say, early in the process, probably at
26 about the time we were becoming engaged in the project.

27 Q So what specifically did she tell you that you

1 recollect?

2 A I've told you what she told me, what I recollect.

3 Q You were paraphrasing, just be careful, she believed
4 that Mike was a member of the mafia?

5 A Yes.

6 Q But I thought that she had --

7 A I don't think that she would have said a member of the
8 mafia, I think it was more like, Jeremy, be careful,
9 he's mafia. Something like that. I didn't know -- it
10 shook me, because I didn't know whether to take it as a
11 euphemism or whether she had knowledge to that effect.
12 I did not know that, and I didn't want to know.

13 Q Did Alderman Farrell's comments at the earlier date
14 colour your perception of the incident in your office?
15 Did that factor into your mind with the knowledge
16 that --

17 A No.

18 Q -- Alderman Farrell had accused Mike?

19 A No.

20 Q What's your relationship like with Alderman Farrell;
21 how close are you?

22 A We have a good professional relationship.

23 Q For how long?

24 A I would say for as long as she's been a councillor. I
25 would say that's 12 years or so.

26 Q And it is your understanding that Mr. Terrigno was
27 referred to you through Alderman Farrell?