

**COMMISSION OF INQUIRY INTO THE SPONSORSHIP PROGRAM
AND ADVERTISING ACTIVITIES**

**NOTICE OF MOTION BY CANADA POST CORPORATION
TO ALLOW ADDITIONAL EVIDENCE FROM MICHELINE MONTREUIL**

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THIS MOTION by Canada Post is to allow additional evidence from Micheline Montreuil by means of either:

- (a) the filing as evidence of the affidavit of Micheline Montreuil sworn May 16, 2005 (the "Montreuil Affidavit"), attached; or
- (b) in the alternative, the re-appearance of Micheline Montreuil before the Commission to provide further oral testimony.

THE GROUNDS FOR THE MOTION ARE:

1. Micheline Montreuil testified before the Commission on January 18 and 19, 2005. During her testimony on January 19, 2005, she was shown two documents, found at pp. 82 and 82K of Exhibit P-181(A). The document at p. 82 suggested that Canada Post had received sponsorship funds in respect of among other things, a 1997 Series of the Century stamp launch and the promotion of a Gilles Villeneuve stamp at the 1997 Grand Prix in Montreal. The document at p. 82K purported, on its face, to be a Canada Post invoice dated October 1, 1997 addressed to Lafleur Communications.
2. During the weeks of February 28, 2005 and March 7, 2005, witnesses who had worked for Lafleur Communications provided additional testimony with respect to these issues.
3. In response both to Micheline Montreuil's initial testimony and the testimony from the Lafleur Communications witnesses, Canada Post counsel undertook to the Commission to make further inquiries respecting these issues. The answers to these inquiries are set out in the Montreuil Affidavit, attached.

4. Canada Post counsel advised Commission counsel of these answers last week. Commission counsel advised Canada Post counsel that, in order for these answers to form part of the record, Canada Post should bring this motion.

5. Rules 23 and 30 of the Commission's Rules of Procedure and Practice.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

(a) the Montreuil Affidavit.

May 16, 2005



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Solicitors for Canada Post Corporation

TO: The Commissioner

AND TO: Commission Counsel
Commission of Inquiry into the Sponsorship Program
and Advertising Activities
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AFFIDAVIT OF MICHELINE MONTREUIL

I, Micheline Montreuil, of the City of Ottawa, in the Province of Ontario,
SWEAR THAT:

1. I am currently General Manager, Retail Products and Philatelic, Canada Post Corporation. At the relevant time in 1997, I was Director, Stamp Products at Canada Post Corporation.
2. I testified before the Commission of Inquiry into The Sponsorship Program and Advertising Activities on January 18 and 19, 2005. During my testimony on January 19, 2005, I was shown a document, found at p. 82K of Exhibit P-181(A), that was filed by the Commission for the first time that day. The document purports on its face, to be a Canada Post invoice dated October 1, 1997 addressed to Lafleur Communications.
3. I testified that I had never seen this invoice before and that it would have been my responsibility to send an invoice of this type.
4. Since that time, I have further examined and considered the invoice and I and Canada Post have made extensive inquiries to determine whether this invoice was produced by Canada Post. The layout of the invoice and the language used in the Invoice are not the layout and language typically used in Canada Post invoices. Furthermore, Canada Post would not have charged Quebec Sales Tax (TVQ) on an invoice such as this, as is done in the invoice at p. 82K. I am informed by Phillip Dempsey, Canada Post counsel and believe that he has inquired of other Canada Post employees and none of them recognize the invoice.

5. Lafleur Communications had Canada Post letterhead at its offices, which was used by them to prepare press releases and other documents on behalf of Canada Post.

6. In addition, I was shown a document, found at p. 82 of Exhibit P-181(A), that suggested that Canada Post had received \$275,000 in sponsorship funds for the 1997 *Series of the Century* stamp launch and \$250,000 in sponsorship funds for the promotion of a Gilles Villeneuve stamp at the 1997 Grand Prix in Montreal. As Canada Post's counsel has already informed the Commission, Canada Post has investigated and been unable to find any indication that the amounts listed at p. 82 of Exhibit P-181(A) were actually paid to Canada Post. That being said, after further review of documents produced by other parties and Canada Post for this Commission, it appears that Canada Post received some goods or services in respect of the *Series of the Century* stamp launch for which it was not billed. However, we are unable to determine the value of these goods or services. With respect to the Grand Prix promotion, I am informed by Phillip Dempsey and believe that Canada Post received some goods or services for which it was not billed but Canada Post is unable to determine the values of these goods or services.

SWORN BEFORE ME at the City of
Ottawa, in the Province of Ontario, on
May 16, 2004.

Commissioner for taking affidavits



Micheline Montreuil

