

**IN THE MATTER OF THE TORONTO EXTERNAL CONTRACTS INQUIRY**

**SUPPLEMENTARY AFFIDAVIT OF SUSAN CROSS**

I, Susan Cross, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. The information in this affidavit is supplemental to the affidavits I swore for the Toronto External Contracts Inquiry on November 18<sup>th</sup>, 2004 (the "November 18<sup>th</sup> Affidavit") and January 6<sup>th</sup>, 2005 (the "January 6<sup>th</sup> Affidavit").
2. In paragraph 23 of the November 18<sup>th</sup> Affidavit I deposed that "I attended a Christmas party hosted by Dell" at the Indian Motorcycle Club. At the time I swore the affidavit, I did verily believe it to be true that Dell hosted this particular Christmas party, although I did not have, and never have had had, any documentary evidence to verify this belief. Moreover, I did not have the benefit of hearing the testimony of David Kelly and David Toms on November 24<sup>th</sup>, 2004 and November 29<sup>th</sup>, 2004 respectively.
3. In retrospect, and in light of the aforementioned testimony, I acknowledge that although my belief expressed in paragraph 23 of the November 18<sup>th</sup> Affidavit was sincerely held it might nonetheless have been mistaken.

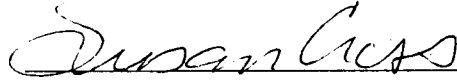
4. I make this affidavit in good faith, to respond to issues related to me that arose in the testimony of David Kelly and David Toms and for no improper purpose.

SWORN before me at the City of  
Toronto, in the Province of Ontario, this  
11<sup>th</sup> day of January, 2005.



Commissioner for Taking Affidavits

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Susan Cross

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