

THE TORONTO COMPUTER LEASING INQUIRY

AFFIDAVIT OF HAROLD PEERENBOOM

I, Harold Peerenboom, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

1. I am the Founder and President of Mandrake Management, an executive search firm, which is a multi-divisional business including an outplacement division.
2. I have known Mr. Tom Jakobek personally since about 1997 when he was appointed to the Toronto Harbour Commission Board by the City of Toronto. I was elected by the Board as its Chair at that time.
3. Mr. Jakobek and I became friends. I contributed to his campaign. Between 1997 and 1999, we went on several social trips (together with others) including two fishing trips to Newfoundland, a trip to Mexico and a trip to Cuba. Except for the trip to Cuba, all of the other trips were by private jets.
4. On November 27, 2002, I returned a call from Bill Blake, who had identified himself on his message as an investigator for the Toronto Computer Leasing Inquiry. Generally, Mr. Blake wanted to know who was on a private plane chartered by MFP (Dash Domi) on May 2, 1999, for the playoff game in Philadelphia between the Leafs and the Flyers. In particular, Mr.

Blake asked me whether Mr. Jakobek was on the plane, and whether he was at the game. In essence, I told Mr. Blake that Mr. Jakobek was not on the plane or at the game.

5. I understand from Commission counsel that Mr. Jakobek was certainly on the plane and at the game based on the airline records, customs documents, Mr. Jakobek's cell phone records recently obtained and recent discussions with Mr. Jakobek. I was also advised by my counsel Symon Zucker immediately before my interview with Commission counsel (on March 27, 2003) that as a result of speaking with Mr. Jakobek's lawyers the night before, Mr. Jakobek would testify that he was on the plane and at the game in Philadelphia. Accordingly, the purpose of this affidavit is to explain why I told the Commission investigator that Mr. Jakobek was not on the flight and at the game.
6. In or about early to mid-November, 2002, I spoke with Mr. Jakobek. He asked me for my recollection. I told him that I had no clear recollection of whether or not he was on the flight, or at the game. Mr. Jakobek told me that he was not on the flight and at the game.
7. My lack of recollection of whether Mr. Jakobek was on the Philadelphia flight is due to the fact that I travel extensively by private plane, and have travelled several times with Mr. Jakobek by private plane to the extent that I do not always remember which planes and trips he was on and not on.
8. Accordingly, as a result of the telephone discussion with Mr. Jakobek described in paragraph 6 and my own lack of a clear recollection, I told Mr. Blake that Mr. Jakobek was not on the

plane or at the game. I understand Commission counsel anticipate that Mr. Jakobek will testify at the Commission as follows:

1. that I invited Mr. Jakobek to fly to Philadelphia on the chartered flight and made the arrangements for him;
2. that Mr. Jakobek gave me a couple of playoff tickets as a thank you for the trip;
3. that Mr. Jakobek picked me up and drove me to the airport;
4. that Mr. Jakobek and I (and others) were on the Philadelphia flight together on May 2, 1999;
5. that Mr. Jakobek and I were together at the game;
6. that Mr. Jakobek and I (and others) ate together at a steakhouse before the game;
7. that I used Mr. Jakobek's phone once or twice to call Mr. Domi because we had lost him; and
8. that Mr. Jakobek called his home and his wife's cell phone from Philadelphia.

I cannot confirm the accuracy of any of these statements but do not dispute them.

9. If Mr. Jakobek had told me any of the details in paragraph 8 above, and refreshed my lack of memory when I spoke with him in November, I would not have told Mr. Blake in the November 27th interview that Mr. Jakobek was not on the plane and at the game.

10. At no time did I tell Mr. Blake anything that I did not believe to be true at the time.

SWORN BEFORE ME at)
the City of Toronto in)
the Province of Ontario on)
 , 2003)
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HAROLD PEERENBOOM

A COMMISSIONER, ETC.