

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

NO: 500-06-000960-183

(Class Action)  
SUPERIOR COURT

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**TOMAS MCENIRY,**

and

**YOSSEF MARCIANO,**

Applicants

-vs-

**ATTORNEY GENERAL OF QUÉBEC**, having an establishment at 1 Notre-Dame Street East, 8<sup>th</sup> floor, Montreal, district of Montréal, province of Québec, H2Y 1B6

and

**HER MAJESTY THE QUEEN**, as represented by the ATTORNEY GENERAL OF CANADA, having a place of business at Complex Guy-Favreau, Quebec Regional Office, Department of Justice, East Tower, 9<sup>th</sup> Floor, 200 Rene-Levesque Boulevard West, district of Montreal, province of Quebec, H2Z 1X4

Defendants

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**APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION AND TO APPOINT THE  
STATUS OF REPRESENTATIVE PLAINTIFFS  
(ARTICLES 571 AND FOLLOWING C.C.P.)**

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**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, YOUR APPLICANT STATES AS FOLLOWS:**

**I. INTRODUCTION**

1. On December 14, 2018, the Supreme Court of Canada rendered a decision finding that the mandatory victim surcharge imposed by section 737 of the *Criminal Code* violates section 12 of the *Charter*, is therefore unconstitutional and declared it to be of no force and effect immediately (*R. v. Boudreault*, 2018 SCC 58);
2. The amount of the mandatory victim surcharge is 30% of any fine imposed, or, where no fine is imposed, \$100.00 for every summary conviction count and \$200.00 for every indictable count (s. 737 *Criminal Code*). In *Boudreault* the Supreme Court pointed out that “Although sentencing judges have the discretion to increase the amount of the surcharge where appropriate, they cannot decrease the amount or waive the surcharge for any reason. The imposition of the surcharge cannot be appealed”;
3. In *Boudreault*, the Supreme Court stated that “it would be inappropriate to grant a remedy to offenders not involved in this case and those no longer in the system who cannot now challenge their sentences”. The SCC went on to explain that private remedies exist for this class of offenders:

[108] The difficulty is in determining what the remedy for this ongoing violation ought to be. Only the *Tinker* appellants and the intervener the Criminal Lawyers’ Association addressed in their pleadings the need for a specific constitutional remedy for the individuals described above. Without the benefit of more robust submissions from the parties on this issue, it would be inappropriate to grant a remedy **for a class of individuals who are not parties to this litigation.**

[109] **Though unable to order a specific remedy for this class of offenders, I would note that a variety of possible remedies exist. Private parties may be able to seek relief in the courts, notably by recourse to s. 24(1) of the *Charter*...**

[our emphasis in bold].

4. Applicants wish to institute a class action on behalf of the following class of which they members, namely:

**Class:**

All persons who were required to pay monies to the state as a mandatory victim surcharge.

(hereinafter referred to as the “Class”);

or any other Class to be determined by the Court;

**II. CONDITIONS REQUIRED TO AUTHORIZE THIS CLASS ACTION AND TO APPOINT THE STATUS OF REPRESENTATIVE PLAINTIFF (SECTION 575 C.C.P.):**

**A) THE FACTS ALLEGED APPEAR TO JUSTIFY THE CONCLUSIONS SOUGHT**

***i) Applicant Yossef Marciano***

5. Mr. Marciano was found guilty of an offence and was ordered to pay \$800.00 to the state as a “mandatory victim surcharge”, as it appears from the September 13, 2017, Probation Order disclosed herewith as **Exhibit P-1**;
6. Mr. Marciano was released on September 19, 2018, after spending approximately two years in jail;
7. At the time of his release Mr. Marciano was 21 years old and without any revenues. His highest level of education completed is high school;
8. As of December 4, 2018, Mr. Marciano owed the state \$2,377.00, and the state already took measures to seize his property, as it appears from the statement of account disclosed as **Exhibit P-2**;
9. Mr. Marciano recently paid \$500.00 to the Defendant, a portion of which was on account of the \$800.00 he owed the state as a “mandatory victim surcharge”, Applicant disclosing the “*Demande de retrait de dépôt judiciaire*”, signed by him on December 7, 2018 and filed at the *Bureau des infractions et amendes de Montréal* in room 2.143 of the Montreal Courthouse on December 11, 2018 as **Exhibit P-3**;
10. Mr. Marciano has no idea how or when he will be able to pay off the remainder of his debt to the state;
11. The debt of \$800.00 on account of the mandatory victim surcharge – on top of all the other fines he owed the Defendant – causes a great deal of stress and fear to Mr. Marciano;
12. This fear and stress (including of imprisonment in case of default) is compounded by

the fact that the Defendant has already obtained orders to seize Mr. Marciano's property, (see Exhibits P-2 and P-3);

13. The mandatory victim surcharge of \$800 is also grossly disproportionate to Mr. Marciano's ability to pay;
14. By all accounts, Mr. Marciano was subjected to a cruel and unusual treatment and punishment, in violation of s. 12 of the *Charter*;
15. On December 14, 2018, the Supreme Court of Canada held that the mandatory victim surcharge violated s. 12 of the Charter and that someone in Mr. Marciano's situation may seek relief in Court by invoking s. 24(1) of the *Charter*;
16. Pursuant to s. 24(1) of the *Charter*, Mr. Marciano hereby seeks compensatory damages in the amount of \$800.00. He also seeks punitive damages in an amount to be determined for himself and for each Class member;

**ii) Applicant Tomas McInery**

17. On January 26, 2018, Mr. McInery was ordered to pay a fine of \$1,500.00 and a mandatory victim surcharge of \$450.00 (equal to 30% of the fine), as it appears from the "*Ordonnance de paiement de l'amende / de la suramende*" disclosed herewith as **Exhibit P-4**;
18. The amount of \$450.00 is grossly disproportionate to the fine and caused a serious financial burden to Mr. McInery;
19. Mr. McInery has since paid the fine and the mandatory victim surcharge because he had no choice and fear being detained in case of default;
20. By all accounts, the threat of being imprisoned for non-payment of the \$450.00 mandatory victim surcharge – which has since been declared unconstitutional – is cruel and unusual treatment and punishment, in violation of s. 12 of the *Charter*;
21. On March 12, 2018, Mr. McInery paid in full the fine and the mandatory victim surcharge, as it appears from **Exhibit P-5**;
22. On December 14, 2018, the Supreme Court of Canada held that the mandatory victim surcharge violated s. 12 of the Charter and that someone in Mr. McInery's situation may seek relief in Court by invoking s. 24(1) of the *Charter*;
23. Pursuant to s. 24(1) of the *Charter*, Mr. McInery hereby seeks compensatory damages in the amount of \$450.00. He also seeks punitive damages in an amount to be determined for himself and for each Class member;

**B) THE CLAIMS OF THE MEMBERS OF THE CLASS RAISE IDENTICAL, SIMILAR OR RELATED ISSUES OF LAW OR FACT:**

24. All Class members are persons who have been charged with an offence and had to pay the mandatory victim surcharge;
25. All Class members suffered financial and moral damages as a result of this situation;
26. The claims of every Class member are founded on very similar facts to the Applicants' claims;
27. By reason of the Defendant's unconstitutional and illegal conduct, Applicants and Class members have suffered damages, which they may collectively claim against the Defendant;
28. The damages sustained by the Class members flow, in each instance, from a common nucleus of operative facts, which occur from the moment that they receive they are ordered to pay the mandatory victim surcharge;
29. All of the damages to the Class members are a direct and proximate result of the Defendant's misconduct;
30. In taking the foregoing into account, all Class members are justified in claiming the sums which they paid to the *Bureau des infractions et amendes* (acting as an agent of the Defendant), in addition to moral damages;
31. Individual questions, if any, pale by comparison to the numerous common questions that are significant to the outcome of the present Application;
32. **The questions of fact and law raised and the recourse sought by this Application are identical with respect to each Class member, namely:**
  - a) Are Class members entitled to the reimbursement of the mandatory victim surcharge paid pursuant to s. 24(1) of the *Charter*;
  - b) Are Class members entitled to punitive damages pursuant to s. 24(1) of the *Charter*;
  - c) Is the Defendant responsible to pay moral damages to Class members and, if so, in what amount?
  - d) Does *res judicata* operate or not as a bar to an application for relief in the present case?

- e) When does prescription start for Class members and what are the factors common to the Class members regarding the impossibility in fact to act?

**C) THE COMPOSITION OF THE CLASS**

33. The composition of the Class makes it difficult or impracticable to apply the rules for mandates to take part in judicial proceedings on behalf of others or for consolidation of proceedings;
34. By all accounts, there are likely hundreds of thousands of people who are members of the Class;
35. The amounts collected by the Defendant on account of the mandatory victim surcharge conservatively estimated to be in the millions of dollars;
36. The names and addresses of all persons included in the Class are not known to the Applicant, but are all in the possession of the Defendant;
37. Class members are very numerous and are dispersed across the province, across Canada and elsewhere;
38. These facts demonstrate that it would be impractical, if not impossible, to contact each and every Class member to obtain mandates and to join them in one action;
39. In these circumstances, a class action is the only appropriate procedure for all of the members of the Class to effectively pursue their respective rights and have access to justice without overburdening the court system;

**D) THE CLASS MEMBERS REQUESTING TO BE APPOINTED AS REPRESENTATIVE PLAINTIFFS ARE A POSITION TO PROPERLY REPRESENT THE CLASS MEMBERS**

40. Applicants requests that they be appointed the status of representative plaintiffs for the following main reasons:
- a) they are both members of the Class and both have a personal interest in seeking the conclusions that they propose herein;
  - b) they are both competent, in that they each have the potential to be the mandatory of the action if it had proceeded under article 91 of the *Code of Civil Procedure*;
  - c) their interests are not antagonistic to those of other Class Members;
41. Additionally, Applicants respectfully add that:

- a) Mr. McInery and Mr. Marciano have the time, energy, will and determination to assume all the responsibilities incumbent upon them in order to diligently carry out the action;
  - b) they mandated their attorneys to file the present application for the sole purpose of having their rights, as well as the rights of other Class Members, recognized and protected so that they may be compensated for the damages that they have suffered;
  - c) they cooperate and will continue to fully cooperate with their attorneys, who respectively have experience in class actions and in criminal law;
  - d) they understand the nature of the action;
42. As for identifying other Class members, Applicants draw certain inferences from the situation and realize that by all accounts, there is a very important number of Class Members that find themselves in an identical situation, and that it would not be any more useful for them to attempt to identify them given their sheer number;
43. For the above reasons, Applicants respectfully submit that their interest and competence are such that the present class action could proceed fairly and in the best interest of Quebec Class Members;

### **III. NATURE OF THE ACTION AND CONCLUSIONS SOUGHT**

44. The action that the Applicants wish to institute on behalf of the Class members is an action in damages, with injunctive relief and a declaratory judgment;
45. The conclusions that the Applicants wish to introduce by way of an Originating Application are:

**GRANT** Plaintiffs' action against Defendant on behalf of all the Class members;

**CONDEMN** the Defendant to pay Tomas McInery the sum of **\$450.00** in compensation of the pecuniary damages suffered, as well as moral damages in an amount to be determined, pursuant to s. 24(1) of the *Charter*;

**CONDEMN** the Defendant to pay Yossef Marciano the sum of **\$800.00** in compensation of the pecuniary damages suffered, as well as moral damages in an amount to be determined, pursuant to s. 24(1) of the *Charter*;

**CONDEMN** the Defendant to pay to each Class member the sum representing the amount of the mandatory victim surcharge paid pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay to each of the members of the Class moral damages, in an amount to be determined, pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay to each of the members of the Class punitive damages, in an amount to be determined, pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay interest and the additional indemnity on the above sums according to law from the date of service of the *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiffs*;

**ORDER** the Defendant to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

**ORDER** that the claims of individual Class members be the object of collective liquidation if the proof permits and alternately, by individual liquidation;

**CONDEMN** the Defendant to bear the costs of the present action, including class counsel's professional fees and disbursements, the cost of notices, the cost of management of claims and the costs of experts, if any, including the costs of experts required to establish the amount of the collective recovery orders;

**RENDER** any other order that this Honourable Court shall determine;

46. The interests of justice favour that this Application be granted in accordance with its conclusions;

#### **IV. JURISDICTION**

47. The Applicants suggest that this class action be exercised before the Superior Court of the province of Quebec, in the district of Montreal, for the following reasons:
- a) A great number of the Class members, including the Applicant Mr. Marciano, reside in the district of Montreal;
  - b) The Defendant has an establishment in the *Palais de justice de Montréal*;
  - c) The Applicants' attorneys practice their profession in the district of Montreal;

#### **V. PRESCRIPTION, IMPOSSIBILITY TO ACT AND RES JUDICATA**

48. In *Boudreault*, the Supreme Court states that that the principle of *res judicata* is not



a bar to an application for relief:

[107] The fact that, at any moment in the cycle of enforcement, the *current state of affairs* may constitute a s. 12 violation means that *res judicata* ought not operate to bar an application for relief from that state of affairs. As this Court found in *R. v. Gamble*, [1988] 2 S.C.R. 595, at p. 630, a “continuing current violation” of a *Charter*-protected interest could give rise to a successful application for a *Charter* remedy, even where the violation began with a valid order that is legally unassailable.

49. Additionally, prescription should not run against Class members because it was impossible for them to act prior to the Supreme Court’s decision in *Boudreault*;

**FOR THESE REASONS, MAY IT PLEASE THE COURT:**

**GRANT** the present application;

**AUTHORIZE** the bringing of a class action in the form of an Originating Application in damages;

**APPOINT** the Applicants the status of representative plaintiffs of the persons included in the Class herein described as:

**Class:**

All persons who were required to pay monies to the state as a mandatory victim surcharge.

(hereinafter referred to as the “**Class**”)

or any other Class to be determined by the Court;

**IDENTIFY** the principle questions of fact and law to be treated collectively as the following:

- a) Are Class members entitled to the reimbursement of the mandatory victim surcharge paid pursuant to s. 24(1) of the *Charter*;
- b) Are Class members entitled to punitive damages pursuant to s. 24(1) of the *Charter*;

- c) Is the Defendant responsible to pay moral damages to Class members and, if so, in what amount?
- d) Does *res judicata* operate or not as a bar to an application for relief in the present case?
- e) When does prescription start for Class members and what are the factors common to the Class members regarding the impossibility in fact to act?

**IDENTIFY** the conclusions sought by the class action to be instituted as being the following:

**GRANT** Plaintiffs' action against Defendant on behalf of all the Class members;

**CONDEMN** the Defendant to pay Tomas McInery the sum of **\$450.00** in compensation of the pecuniary damages suffered, as well as moral damages in an amount to be determined, pursuant to s. 24(1) of the *Charter*;

**CONDEMN** the Defendant to pay Yossef Marciano the sum of **\$800.00** in compensation of the pecuniary damages suffered, as well as moral damages in an amount to be determined, pursuant to s. 24(1) of the *Charter*;

**CONDEMN** the Defendant to pay to each Class member the sum representing the amount of the mandatory victim surcharge paid pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay to each of the members of the Class moral damages, in an amount to be determined, pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay to each of the members of the Class punitive damages, in an amount to be determined, pursuant to s. 24(1) of the *Charter*, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendant to pay interest and the additional indemnity on the above sums according to law from the date of service of the *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiffs*;

**ORDER** the Defendant to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

**ORDER** that the claims of individual Class members be the object of collective

liquidation if the proof permits and alternately, by individual liquidation;

**CONDEMN** the Defendant to bear the costs of the present action, including class counsel's professional fees and disbursements, the cost of notices, the cost of management of claims and the costs of experts, if any, including the costs of experts required to establish the amount of the collective recovery orders;

**RENDER** any other order that this Honourable Court shall determine;

**DECLARE** that all members of the Class that have not requested their exclusion, be bound by any judgement to be rendered on the class action to be instituted in the manner provided for by the law;

**FIX** the delay of exclusion at thirty (30) days from the date of the publication of the notice to the members, date upon which the members of the Class that have not exercised their means of exclusion will be bound by any judgement to be rendered herein;

**ORDER** the publication of a notice to the members of the Class in accordance with article 579 C.C.P. within sixty (60) days from the judgement to be rendered herein in the "News" sections of the Saturday editions of LA PRESSE, LE JOURNAL DE MONTRÉAL, and the MONTREAL GAZETTE;

**ORDER** that said notice be published on the Defendant's websites, Facebook pages and Twitter accounts, in a conspicuous place, with a link stating "Notice of a Class Action Cameras – Avis d'une action collective";

**RENDER** any other order that this Honourable Court shall determine;

The whole with costs including publications fees.

Montréal, December 14<sup>th</sup>, 2018

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Per: Me Joey Zukran

[JZUKRAN@LPCLEX.COM](mailto:JZUKRAN@LPCLEX.COM)

Co-Counsel for Applicants

Montréal, December 14<sup>th</sup>, 2018

*(s) Ticket911.ca inc.*

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**TICKET911.CA INC.**

Per: Me Bernard Levy-Soussan

[BLS@TICKET911.CA](mailto:BLS@TICKET911.CA)

Co-Counsel for Applicants

**SUMMONS**  
(ARTICLES 145 AND FOLLOWING C.C.P)

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**Filing of a judicial application**

Take notice that the Applicant has filed this Application for Authorization to Institute a Class Action and to Appoint the Status of Representative Plaintiff in the office of the Superior Court in the judicial district of **Montreal**.

**Defendant's answer**

You must answer the application in writing, personally or through a lawyer, at the courthouse of Montreal situated at 1 Rue Notre-Dame E, Montréal, Quebec, H2Y 1B6, within 15 days of service of the Application or, if you have no domicile, residence or establishment in Québec, within 30 days. The answer must be notified to the Applicant's lawyer or, if the Applicant is not represented, to the Applicant.

**Failure to answer**

If you fail to answer within the time limit of 15 or 30 days, as applicable, a default judgement may be rendered against you without further notice and you may, according to the circumstances, be required to pay the legal costs.

**Content of answer**

In your answer, you must state your intention to:

- negotiate a settlement;
- propose mediation to resolve the dispute;
- defend the application and, in the cases required by the Code, cooperate with the Applicant in preparing the case protocol that is to govern the conduct of the proceeding. The protocol must be filed with the court office in the district specified above within 45 days after service of the summons or, in family matters or if you have no domicile, residence or establishment in Québec, within 3 months after service;
- propose a settlement conference.

The answer to the summons must include your contact information and, if you are represented by a lawyer, the lawyer's name and contact information.

**Change of judicial district**

You may ask the court to refer the originating Application to the district of your domicile or residence, or of your elected domicile or the district designated by an agreement with the plaintiff.

If the application pertains to an employment contract, consumer contract or insurance contract, or to the exercise of a hypothecary right on an immovable serving as your main residence, and if you are the employee, consumer, insured person, beneficiary of the insurance contract or hypothecary debtor, you may ask for a referral to the district of your domicile or residence or the district where the immovable is situated or the loss occurred. The request must be filed with the special clerk of the district of territorial jurisdiction after it has been notified to the other parties and to the office of the court already seized of the originating application.

### **Transfer of application to Small Claims Division**

If you qualify to act as a plaintiff under the rules governing the recovery of small claims, you may also contact the clerk of the court to request that the application be processed according to those rules. If you make this request, the plaintiff's legal costs will not exceed those prescribed for the recovery of small claims.

### **Calling to a case management conference**

Within 20 days after the case protocol mentioned above is filed, the court may call you to a case management conference to ensure the orderly progress of the proceeding. Failing this, the protocol is presumed to be accepted.

### **Exhibits supporting the application**

In support of the Application for Authorization to Institute a Class Action and to Appoint the Status of Representative Plaintiff, the Applicant intends to use the following exhibits:

**Exhibit P-1:** Copy of Yossef Marciano's Probation Order dated September 13, 2017;

**Exhibit P-2:** Copy of Yossef Marciano's statement of account as of December 4, 2018;

**Exhibit P-3:** Copy of the "*Demande de retrait de dépôt judiciaire*", signed by Yossef Marciano on December 7, 2018;

**Exhibit P-4:** Copy of Tomas McNery's "*Ordonnance de paiement de l'amende / de la suramende*" dated January 26, 2018;

**Exhibit P-5:** Copy of Tomas McNery's proof of payment dated March 12, 2018.

These exhibits are available on request.

## Notice of presentation of an application

If the application is an application in the course of a proceeding or an application under Book III, V, excepting an application in family matters mentioned in article 409, or VI of the Code, the establishment of a case protocol is not required; however, the application must be accompanied by a notice stating the date and time it is to be presented.

Montréal, December 14<sup>th</sup>, 2018

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Per: Me Joey Zukran

[JZUKRAN@LPCLEX.COM](mailto:JZUKRAN@LPCLEX.COM)

Co-Counsel for Applicants

Montréal, December 14<sup>th</sup>, 2018

*(s) Ticket911.ca inc.*

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**TICKET911.CA INC.**

Per: Me Bernard Levy-Soussan

[BLS@TICKET911.CA](mailto:BLS@TICKET911.CA)

Co-Counsel for Applicants

**NOTICE OF PRESENTATION**  
(articles 146 and 574 al. 2 N.C.P.C.)

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**TO: ATTORNEY GENERAL OF QUÉBEC**  
1 Notre-Dame Street East, 8<sup>th</sup> floor  
Montréal, Québec, H2Y 1B6  
**Defendant**

**HER MAJESTY THE QUEEN**, as represented by the ATTORNEY GENERAL OF CANADA  
Complex Guy-Favreau, Quebec Regional Office  
Department of Justice, East Tower, 9<sup>th</sup> Floor  
200 Rene-Levesque Boulevard West  
Montréal, Québec, H2Z 1X4  
**Defendant**

**TAKE NOTICE** that Applicants' *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiffs* will be presented before the Superior Court at **1 Rue Notre-Dame E, Montréal, Quebec, H2Y 1B6**, on the date and time set by the coordinator of the Class Action chamber.

**GOVERN YOURSELVES ACCORDINGLY.**

Montréal, December 14<sup>th</sup>, 2018

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Per: Me Joey Zukran

[JZUKRAN@LPCLEX.COM](mailto:JZUKRAN@LPCLEX.COM)

Co-Counsel for Applicants

Montréal, December 14<sup>th</sup>, 2018

*(s) Ticket911.ca inc.*

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**TICKET911.CA INC.**

Per: Me Bernard Levy-Soussan

[BLS@TICKET911.CA](mailto:BLS@TICKET911.CA)

Co-Counsel for Applicants



500-06-000960-183

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(Class Action)  
SUPERIOR COURT  
DISTRICT OF MONTREAL

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**TOMAS MCINERY ET AL.**

Applicants

v.

**THE ATTORNEY GENERAL OF QUÉBEC**  
and  
**HER MAJESTY THE QUEEN**

Defendants

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**APPLICATION TO AUTHORIZE THE BRINGING  
OF A CLASS ACTION AND TO APPOINT THE  
STATUS OF REPRESENTATIVE PLAINTIFFS  
(ARTICLES 571 AND FOLLOWING C.C.P.)**

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**ORIGINAL**

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Me Joey Zukran  
**LPC AVOCAT INC.**  
Avocats • Attorneys  
5800 blvd. Cavendish, Suite 411  
Montréal, Québec, H4W 2T5  
Téléphone: (514) 379-1572 • Télécopieur: (514) 221-4441  
Email: [jzukran@lpclex.com](mailto:jzukran@lpclex.com)

**BL 6059**

N/D : JZ-189

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