

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X	
GOLDEN GATE YACHT CLUB,	:
	:
Plaintiff,	:
	:
v.	:INDEX NO. 602446/07
	:
SOCIÉTÉ NAUTIQUE DE GENÈVE,	:IAS Part 54
	:
Defendant,	:Hon. Shirley Werner Kornreich
	:
v.	:
	: <b>AFFIDAVIT OF</b>
	: <b>LUCIEN MASMEJAN</b>
	:
CLUB NÁUTICO ESPAÑOL DE VELA,	:
	:
Intervenor-Defendant.	:
-----X	

LUCIEN MASMEJAN, being duly sworn, deposes and says:

1. I am a citizen of Switzerland over the age of 18, and a member the law firm of Lenz & Staehelin in Lausanne, Switzerland. I am also a member of Société Nautique de Genève (“SNG”), as well as its America’s Cup Committee Secretary. I submit this Affidavit in support of SNG’s Motion In Opposition to Golden Gate Yacht Club’s (“GGYC”) Motion for Contempt.
2. In my capacity as America’s Cup Committee Secretary, I am SNG’s representative and advisor in matters pertaining to the 33<sup>rd</sup> America’s Cup.
3. Attached hereto as Exhibit A is a true and correct copy of a letter from Fred Meyer and Alec Tournier of SNG to Marcus Young of GGYC, dated May 5, 2009.
4. On April 23, 2009, I participated in the second meeting between SNG and GGYC related to the 33<sup>rd</sup> America’s Cup, which was held at SNG in Port-Noir, Geneva. Also in attendance at the meeting from SNG were Fred Meyer, SNG Vice-Commodore and America’s Cup Committee Chairman; Brad Butterworth, a member of SNG and its America’s Cup

Committee Vice-Chairman; and Ana Gil-Robles, SNG's ad-hoc secretary. In attendance from GGYC was Melinda Erkelens, a GGYC board member and general counsel of BMW Oracle Racing; Manuel Ruiz de Elvira, of the BMW Oracle Racing design team; and Richard Slatter, the BMW Oracle racing rules advisor.

5. The meeting was intended to continue the mutual consent negotiations between SNG and GGYC, following a first meeting that was held at SNG on March 26, 2008. At this first meeting, SNG and GGYC representatives failed to agree the dates for the Deed of Gift Match as GGYC had proposed race dates for October 2008 in the Northern Hemisphere, which would have left SNG with less than ten months notice to be ready. The reason for GGYC to propose such an early date in October was that GGYC acknowledged that no race could be sailed in the Northern Hemisphere from November to April.

6. In the second meeting (April 23, 2009) it was intended to discuss again the appropriate dates for the 33<sup>rd</sup> America's Cup.

7. At the beginning of the meeting, SNG stated its position regarding the necessary characteristics of the vessel for the match, making clear that such vessel was to comply with GGYC vessel certificate dated 11 July 2007. SNG confirmed its disposition to discuss and to mutually agree the terms of the match. If no other mutual agreement, SNG advised that it intended to select a venue for the match in the Northern Hemisphere, as both SNG and GGYC are located in that hemisphere. GGYC's notice of challenge further specified a Northern Hemisphere match.

8. SNG explained that it believed it was constrained from hosting the 33<sup>rd</sup> America's Cup in the Northern Hemisphere between November 1<sup>st</sup> and May 1<sup>st</sup> under the express terms of the Deed of Gift. The Deed of Gift does not permit races for the Cup to be sailed in that hemisphere during those months.

9. SNG expressed to GGYC its conclusion that the appropriate resolution of these two premises would be to hold the 33<sup>rd</sup> America's Cup races in the Northern Hemisphere but on the soonest dated permitted by the Deed of Gift – May 3, May 5, and May 7, 2010.

10. At no time during this meeting did any of GGYC's representatives disagree with these statements from SNG. None of GGYC's representatives said this was contrary to the Order of this Court, or that the races must be held in February, 2010.

11. At the end of this meeting, I approached Ms. Erkelens to specifically ask whether she wanted to discuss the race date issue. She replied that she preferred to do it in another meeting, and asked if I was available for a meeting in New York the week of April 27. Unfortunately, I was not available in New York for those dates, and said we would have to find another time.

12. On April 23, 2009, SNG confirmed in writing to GGYC the content of the meeting. Such letter made clear that the terms set for the match were subject of the parties not reaching mutual consent: *"At this stage, we wish to confirm arrangement for the 33<sup>rd</sup> America's Cup, if no further mutual agreement can be reached and it had to be conducted under the default terms of the Deed of Gift"*. Attached hereto as Exhibit B is a true and correct copy of a letter from Fred Meyer of SNG to Marcus Young of GGYC, dated April 23, 2009.

13. Prior to GGYC's surprising court filing, I and SNG believed in the utmost good faith that the parties were still negotiating the terms of the next America's Cup match.

14. Attached hereto as Exhibit C is a true and correct copy of a letter from Lorenzo Rizzardi of Circolo di Vela Gargnano to Marcus Young of GGYC, dated May 6, 2009.

15. Attached hereto as Exhibit D is a true and correct copy of a letter from Marcus Young of GGYC to Lorenzo Rizzardi of Circolo di Vela Gargnano, dated May 6, 2009.

16. Attached hereto as Exhibit E is a true and correct copy of a letter from Marcus Young of GGYC to Fred Meyer of SNG, dated May 6, 2009.

17. Attached hereto as Exhibit F is a true and correct copy of the Notice of Challenge from Lorenzo Rizzardi of Circolo di Vela Gargnano to Fred Meyer of SNG, dated May 11, 2009.

18. On April 29, Team Alinghi SA a criminal complaint against Antoine Jean Bonnaveau, a French resident who is an employee of GGYC's racing team, BMW Oracle Racing, in Lausanne, Switzerland, for violation of secrecy or privacy with the use of a photo camera device.

19. Attached hereto as Exhibit G is a true and correct copy of the April 29, 2009 minutes of Mr. Bonnaveau's hearing before the police in Montpellier, France, and a certified translation of the same.

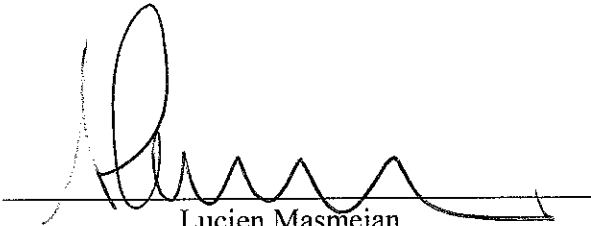
20. On April 28, 2009, Mr. Bonnaveau drove to Villeneuve, Switzerland to take pictures of the facilities operated there by Alinghi, SNG's racing team, in order to gain information about boats Alinghi might use in its defense of the America's Cup. He returned for the same purpose the next day.

21. On April 29, 2009, Mr. Bonnaveau went back to the Alinghi tents and took measurements of various tents and structures at the site for the same purpose. He used GPS and a rangefinder to have a more precise idea of the proportions from the photographs he took.

22. After he was detained by French authorities, Mr. Bonnaveau stated that he had been hired by BMW Oracle Racing in December 2007 to carry out these scoping activities on rival teams, and was paid a salary of €10,000 a month to do so. He further stated that he was part of an entire staff employed for this purpose, in what is referred to as a "recon cell."

23. This criminal case has yet to be resolved, and it is not yet known when the investigating magistrate will render a verdict as to whether any laws were broken in connection with this incident.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. This Affidavit was executed on May 11, 2009 in Lausanne, Switzerland.

By:   
Lucien Masméjan

# Exhibit A



# SOCIÉTÉ NAUTIQUE DE GENÈVE

5 May 2009

Marcus Young  
Commodore  
Golden Gate Yacht Club  
#1 Yacht Road  
San Francisco, California 94123

Dear Commodore,

We write to invite you to resume the meeting of April 23, 2009 between SNG and GGYC and to continue our discussions about the details of the next America's Cup, including the race date, the submission of GGYC's Custom House registry, and the potential involvement of other yacht clubs in the multi-hull match that GGYC has proposed.

As you know on April 23, 2009, representatives of SNG met with representatives of GGYC in Geneva, Switzerland. SNG's representatives were Fred Meyer, SNG Vice-Commodore and America's Cup Committee Chairman; Brad Butterworth, SNG member and America's Cup Committee Vice-Chairman; Lucien Masméjan, SNG member and America's Cup Committee Secretary; and Ana Gil-Robles, SNG ad-hoc secretary. GGYC's representatives were Melinda Erkelens, GGYC board member and BMW ORACLE Racing General Counsel; Manuel Ruiz de Elvira, BMW ORACLE Racing Design Team; and Richard Slatter, BMW ORACLE Racing Rules Advisor.

At this meeting SNG asked GGYC to discuss the dates for the race. SNG explained its view that it had to comply with the express terms of the Deed of Gift. This meant the race would be held on the first permissible date under the Deed of Gift, May 3, 2010. None of GGYC's multiple representatives said anything in protest to SNG's statement that it believed the first race date set forth under the New York Court's Order read together with the Deed of Gift was May 3, 2010. No one said that this date was contrary to the Order. No one said that it was inconsistent with the Deed of Gift. No one said the race needed to be held in February, 2010. GGYC's representatives instead chose to remain entirely silent on the race date.

At the conclusion of the meeting, Mr. Masméjan tried again to raise the race date issue with Ms. Erkelens. This was part of an effort to see if the parties could reach mutual agreement on the date of the race. The New York Court's Order expressly allows that:





# SOCIÉTÉ NAUTIQUE DE GENÈVE

“Notwithstanding the above, the parties may mutually agree in writing to other dates.” Mr. Masmajan specifically asked Ms. Erkelens whether she wanted to discuss the race date. Ms. Erkelens responded that she preferred to do it in another meeting. Ms. Erkelens asked if Mr. Masmajan would be available for a meeting for the week of April 27 in New York. Mr. Masmajan said he was not so they would need to find another mutually convenient time.

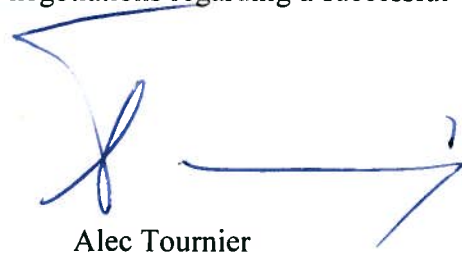
Instead of arranging the follow-up meeting discussed at the conclusion of the April 23 meeting, GGYC decided last Monday to renew its legal proceedings. While we are disappointed with GGYC’s decision to turn again to litigation, we remain willing to continue our mutual consent negotiations on the race date and other issues regarding the next America’s Cup. To this end, we propose a meeting of representatives from GGYC and SNG on May 11, 2009 at 10.30 local time.

Finally, at our previous meeting we once again insisted on our Deed of Gift right to be timely informed about the Challenging Vessel and to that effect to receive as soon as possible a custom-house registry of such vessel. The Deed of Gift requires deliver of the registry “as soon as possible”. We would encourage GGYC to obviate the need for additional Court intervention by simply complying with its obligations under the Deed of Gift and providing the Custom House registry of its challenge vessel to SNG.

We look forward to meeting with you to continue our negotiations regarding a successful 33<sup>rd</sup> America’s Cup.

Yours sincerely,

  
Fred Meyer,  
America’s Cup Committee Chairman

  
Alec Tournier  
General secretary





# Exhibit B



# SOCIÉTÉ NAUTIQUE DE GENÈVE

Mr Marcus Young  
Commodore  
The Golden Gate Yacht Club  
1 Yacht Road  
San Francisco  
California 94123  
USA

23 April 2009

## 33<sup>rd</sup> America's Cup

Dear Commodore

We are writing to you following the second meeting we had with representatives of your Yacht Club at SNG on April 23, 2009.

Contrary to what you indicated in your letter dated April 7, 2009, you have unilaterally elected to breach the confidentiality of our discussions and decided to make public all your letters and proposals. We deeply regret it as this is not in the spirit of positive discussions and negotiations.

At this stage and as condition for any further mutual agreement discussions, we request that you finally declare your challenging vessel.

On July 11, 2007, you issued a Certificate of Name, Rig and specified Dimensions of a 90 by 90 feet keel yacht named USA. Although your Certificate was referring to a keel yacht, you kept the position throughout the Court proceedings that the Certificate was indeed referring to a multi-hull vessel. As a consequence, Justice Cahn ruled in your favour in two orders, dated March 17, 2008 and May 12, 2008, which have now both entered in force.

At the first meeting that was held with regard to your challenge at SNG on March 27, 2008, your representatives, Mr. Russell Coutts and Mr. Tom Ehman, insisted on setting an early date in October 2008 for us to race your challenging vessel. They indicated that such vessel was well under construction and that it was going to be launched soon. This was confirmed by a press release issued by BMW Oracle Racing on April 9, 2008.

As a consequence, we required you to deliver the Custom House Registry Certificate and in a letter of April 29, 2008, you indicated that you "were in communication with a US Coast Guard approved measurement organization" and that you were "following the customary process for obtaining the tonnage certificate and then the Certificate of Documentation from the US Coast Guard". You confirmed this again in your letter of 19<sup>th</sup> May 2008.





# SOCIÉTÉ NAUTIQUE DE GENÈVE

In your press statements and letters of August 2008, we could read that your challenging vessel had “touched water” and that it was a giant trimaran, which had a waterline beam and length as per your Certificate. However, and contrarily to what you promised, you still have not delivered the Custom’s House Registry Certificate and you keep referring in some of your letters to a mono-hull keel yacht.

We now require you to confirm in good faith that the boat that you have launched on August 22, 2008 in Anacortes (USA), is the vessel described in your Certificate dated July 11, 2007, and named USA and we invite you to deliver immediately the corresponding Custom House Registry.

We further draw your attention to the fact that – based on your Certificate and your aforementioned declarations – we have been building a giant multi-hull to meet your challenge on the water. We did so in good faith based on the aforementioned declarations and we have assumed that you were acting like us in good faith. If it were proven not to be the case, we would have to reserve the right to claim for the damages arising for our Yacht Club.

We now assume that you will declare your boat in the coming days and we confirm that we are happy to discuss with you any other issue related to the Match for the America’s Cup including the organisation of a Challenger Selection Series and a reasonable extension of time to allow challengers an opportunity to prepare.

At this stage, we wish to confirm arrangements for the 33<sup>rd</sup> America’s Cup, if no further mutual agreement can be reached and it had to be conducted under the default terms of the Deed of Gift. We have been guided by the terms of your notice of challenge, the Deed of Gift and the rulings of the New York Courts. We advise as follows:

1. It is our intention to meet you on the water in accordance with the terms of the Deed. To accomplish this, we will adhere strictly to all aspects of your notice of challenge dated 11 July 2007, the Deed and the decisions of the Courts.
2. Our vessel, if of one mast, shall be not less than forty-four (44) feet nor more than ninety (90) feet on the load water-line; if of more than one mast it shall not be less than eighty (80) feet nor more than one hundred and fifteen (115) feet on the load water-line.
3. In accordance with your notice of challenge which specified Match dates for a Northern Hemisphere venue and given both clubs are situated in the Northern Hemisphere, you are advised that Société Nautique de Genève will select a venue in the Northern Hemisphere, with the consequence that pursuant to the express terms of the Deed under which we are both bound, the scheduled dates for the match shall be 3 May 2010 for the first race, 5 May 2010 for the second race and if required 7 May 2010 for the third race. In any case, one (1) week day shall intervene between the conclusion of one (1) race and the start of the next race. These dates are the very earliest dates permitted for the Match by the Deed after expiry of your tolled 10 month notice period.





# SOCIÉTÉ NAUTIQUE DE GENÈVE

4. Three (3) races shall be sailed and the winner of two (2) of such races shall be entitled to the Cup. All such races shall be on ocean courses, which may include a venue in the Mediterranean, Baltic, North, Red, Black or other similar Sea, free from headlands, as follows:

The first race twenty (20) nautical miles to windward and return; the second race an equilateral triangular race of thirty nine (39) nautical miles, the first leg of which shall be a beat to windward; the third race (if necessary) twenty (20) nautical miles to windward and return.

5. These ocean courses shall be practicable in all parts for vessels of twenty two (22) feet draught of water and shall be selected by the America's Cup Committee of Société Nautique de Genève. The Committee will undertake a selection process over the next several months and will announce its decision not later than six months prior to the Match.
6. The races shall be sailed subject to such rules and sailing regulations as may now or hereafter be promulgated by the Société Nautique de Genève, so far as they do not conflict with the provisions of the Deed of Gift. No time allowances shall be permitted.
7. The representative vessel of the Société Nautique de Genève shall be named at the time agreed upon for the start of the Match. This vessel shall be of such dimensions as are consistent with the Deed of Gift. All design and construction elements, including such items as number of hulls and particulars of rigging, shall be of our choosing.
8. Société Nautique de Genève may adopt regulations clarifying and implementing the provisions of the Deed of Gift related to measurement of the challenging vessel and its compliance with the notice of challenge. We will promptly advise you of the adoption of any such regulations.

We look forward to racing in the 33<sup>rd</sup> America's Cup and if successful we hope to welcome a challenger for the 34<sup>th</sup> America's Cup, providing for an open multi challenger event where the cost of competition allows all competitors a realistic chance of winning.



Fred Meyer

Vice-Commodore and Chairman of America's Cup Committee



# Exhibit C



**CIRCOLO  
VELA  
GARGNANO**  
soc. coop. dilett.

**The Golden Gate Yacht Club  
1 Yacht Road  
San Francisco, CA 94123**

To the kind attention of Mr. Marcus  
Young – Commodore

BY DHL  
*Anticipated by email [commodore@ggyc.com](mailto:commodore@ggyc.com)*

Bogliaco di Gargnano, 6 May 2009

**Re: 33<sup>rd</sup> America's Cup – Multi-Challengers Event**

Dear Commodore,

We are writing to express to you our willingness to participate in a multi-challenger event in multi-hull vessels.

Our team has actively prepared to participate in the 33<sup>rd</sup> America's Cup and we intend to compete in multi-hulls provided enough time is given to the challengers to prepare.

We are a yacht club eligible under the provisions of the Deed of Gift and we represent Italy, a country that has consistently taken part to all America's Cup editions in the last 25 years and that it is widely recognized as being among the top sailing nations and ship builders in the world.

Recognizing that the Defender and current Challenger of record have expressed their willingness for a multi-challenger event, we encourage you to open a challenger selection process and to make arrangements on the dates, courses, number of trials, rules and sailing regulations, and any and all other conditions of the races.

While we acknowledge that all involved yacht clubs have invested and will invest lot of time and resources in building their vessels, we know that a regatta in multi-hull vessels will cause the greatest interest in the sport of sailing and in the America's Cup community and we are looking forward to competing in the 33<sup>rd</sup> America's Cup very soon.

For your information, the same letter has been sent to Société Nautique de Genève.

We urge you to reply to our genuine request as soon as possible.

Yours sincerely,

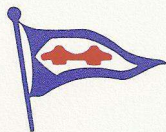
Circolo Vela Gargnano

Lorenzo Rizzardi  
Président



# Exhibit D





## GOLDEN GATE YACHT CLUB

#1 Yacht Road  
San Francisco, CA 94123

May 6, 2009

President Lorenzo Rizzardi  
Circolo Vela Gargnano  
Via C.A. Bettoni, 23  
25080 Bogliaco (BS)  
ITALY

Email: [info@centomiglia.it](mailto:info@centomiglia.it)

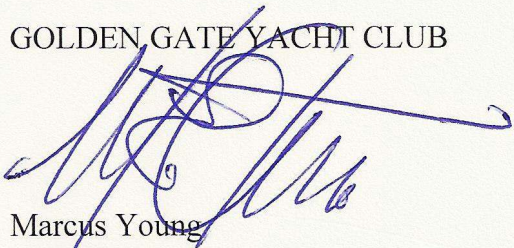
Dear President Rizzardi,

Thank you for your letter of 6 May 2009 concerning the 33<sup>rd</sup> America's Cup ("AC33"). We note that your Club sponsored the +39 Challenge for the 32<sup>nd</sup> America's Cup.

As you will be aware, there is litigation pending concerning AC33. It would be inappropriate to comment further on your letter until that litigation is resolved.

Sincerely,

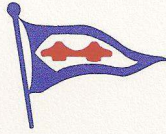
GOLDEN GATE YACHT CLUB



Marcus Young  
Commodore

cc: Russell Coutts, BMW ORACLE Racing  
Larry Ellison, BMW ORACLE Racing

# Exhibit E



## GOLDEN GATE YACHT CLUB

#1 Yacht Road  
San Francisco, CA 94123

May 6, 2009

Mr. Fred Meyer  
Vice-Commodore  
Chairman, SNG America's Cup Committee  
Société Nautique de Genève  
Port Noir  
CH-1223 Cologny  
Switzerland

Dear Vice-Commodore Meyer:

We write in response to your letters of April 23 and May 5, 2009. They contain numerous self-serving factual statements that we believe are entirely inaccurate, and we strongly disagree with many of the positions that you have taken in those letters.

Therefore, and regrettably, we find it hard to believe that your invitation to meet before the Court hearing on May 14, 2009 is anything but a litigation tactic.

We will respond substantively to your letters after next Thursday's hearing. In the meantime, and with this letter, we waive no rights and make no admissions, and reserve all rights on all matters.

Sincerely,

GOLDEN GATE YACHT CLUB

Marcus Young  
Commodore

cc: Ernesto Bertarelli, Team Alinghi  
Brad Butterworth, Team Alinghi  
Russell Coutts, BMW ORACLE Racing  
Larry Ellison, BMW ORACLE Racing

# Exhibit F



**CIRCOLO**  
**VELA**  
**GARGNANO**  
soc. coop. diletta.

11 May 2009

Pierre-Yves Firmenich  
Société Nautique de Genève  
Port Noir  
CH 1223 Cologny  
Switzerland

**Enclosed Challenge for the 33<sup>rd</sup> America's Cup**

Dear Commodore,

Attached is a *bona fide* challenge from Circolo di Vela Gargnano (CVG) made under similar terms as the Notice of Challenge submitted by Golden Gate Yacht Club (GGYC) on July 11, 2007. CVG respectfully requires to be accepted as a legitimate Challenger for the 33<sup>rd</sup> America's Cup. CVG submits its challenge in the hope that, as contemplated by the Deed of Gift, the Challenger of Record will organize Challenger Selection Series and will open its challenge to other Challengers to preserve this competition as a friendly competition between nations.

CVG is fully prepared to meet all the obligations of the Challenger, as provided by the letter and spirit of the Deed of Gift, in accordance with the history and tradition of the oldest trophy in international sport.

Sincerely,

Lorenzo Rizzardi  
President  
Circolo di Vela Gargnano



**CIRCOLO  
VELA  
GARGNANO**  
soc. coop. dilett.

11 May 2009

Pierre-Yves Firmenich  
Société Nautique de Genève  
Port Noir  
CH 1223 Cologny  
Switzerland

### **Notice of Challenge for the 33<sup>rd</sup> America's Cup**

Dear Commodore,

It is with much pleasure that the Circolo di Vela Gargnano (CVG) hereby formally challenges Société Nautique de Genève (SNG) to a match for the America's Cup.

This Notice of Challenge is given in accordance with the America's Cup Deed of Gift dated 24 October 1887 between George L Schuyler and the New York Yacht Club as amended by Orders of the Supreme Court of the State of New York dated 17 December 1956 and 5 April 1985.

We are pleased to confirm that CVG:

- (a) is incorporated in Gargnano, Italy ;
- (b) maintains a membership of more than 250 members;
- (c) operates as a yacht club and has objectives consistent with the furtherance of yachting activities;
- (d) is a member of our national sailing authority, the Italian Sailing Federation; and

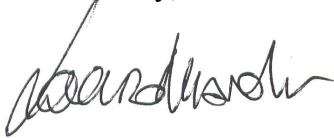
(e) has an annual regatta, the Cento Cup that, among other CVG regattas, is and has been held annually on a arm of the sea, namely Mediterranean Sea in Trapani, Italy.

We shall of course accept the race dates and venue set by the Challenger of Record and the Defender under the Deed of Gift or by mutual consent provided that we would favour a match in the Northern Hemisphere (the Hemisphere where the Challenger of Record, the Defender and ourselves are based).

We acknowledge that the Deed of Gift contemplated negotiations between the Challenger and the Defender and nothing in this Challenge is intended to circumvent consensual negotiations in the spirit of the Deed of Gift toward a Protocol.

Also in accordance with the requirement of the Deed of Gift, attached is the Certificate as to the name, rig and specified dimensions of the challenging vessel. The “Custom House” registry of the challenging vessel will be sent as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lorenzo Rizzardi', written in a cursive style.

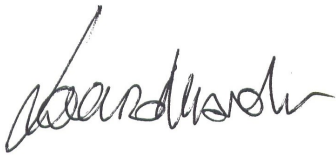
Lorenzo Rizzardi  
President  
Circolo di Vela Gargnano

**CERTIFICATE  
OF NAME, RIG AND SPECIFIED DIMENSIONS OF  
CHALLENGING VESSEL**

I, President Lorenzo Rizzardi, certify the details set out below as to the name, rig and specified dimensions of the challenging vessel to represent Circolo di Vela Gargnano in a match for the America's Cup to be sailed in accordance with the Notice of Challenge herewith:

1. **Name:** Green Comm Challenge
2. **Owner:** Green Comm Challenge
3. **Rig:** Single-masted, sloop-rigged
4. **Dimensions:**
  - (a) Length on Load Waterline – 90 feet
  - (b) Beam at Load Waterline – 90 feet
  - (c) Extreme Beam – 90 feet
  - (d) Draught of water (hull draft) – 3 feet
  - (e) Draught of water (boards down) – 20 feet

For the **Circolo di Vela Gargnano**



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**Lorenzo Rizzardi, President**



# Exhibit G



**GEOTEXT**  
Translations, Inc.

STATE OF NEW YORK            )  
  )  
  )            ss  
COUNTY OF NEW YORK        )

**CERTIFICATION**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from French into English of the attached Hearing Records, dated May 6, 2009.

Nicholas Bocek, Managing Editor  
Geotext Translations, Inc.

Sworn to and subscribed before me  
this 8 day of May, 2009.

JEFFREY AARON CURETON  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01CU6169789  
Qualified in Queens County  
My Commission Expires July 22, 2011

New York 259 West 30th Street, 17th Floor, New York, NY 10001, U.S.A. tel 212.631.7432 fax 212.631.7778  
San Francisco 220 Montgomery Street, 3rd Floor, San Francisco, CA 94104, U.S.A. tel 415.576.9500 fax 415.520.0525  
London 107-111 Fleet Street, London EC4A 2AB, United Kingdom tel +44.(0)20.7936.9002 fax +44.(0)20.7990.9909  
Hong Kong 20th Floor, Central Tower, 28 Queen's Road, Central, Hong Kong tel +852.2159.9143 fax +852.3010.0082

HEARING RECORDS

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ACCUSED

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BONNAVEAU

Jean Antoine

CASE RECORD

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BONNAVEAU

Jean Antoine

1

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FRENCH REPUBLIC  
MINISTRY OF THE INTERIOR

[stamp:] COPY

GENERAL DIRECTORATE  
FOR THE NATIONAL  
POLICE

The first of May,  
two thousand nine  
At 5 p.m.

MONTPELLIER REGIONAL  
JUDICIAL POLICE  
DEPARTMENT  
Nîmes Branch

We, **Stéphanie LONCQ**  
Police Sergeant  
On duty with the Montpellier Regional Judicial Police  
Department  
Nîmes Branch of the Judicial Police

Record no. 2009/38617

CASE:

Vs./X....

SUBJECT:

HEARING  
of  
Jean Antoine BONNAVEAU

[stamp:]  
CERTIFIED TRUE COPY

Judicial Police Officer  
NATIONAL POLICE  
MONTPELLIER  
REGIONAL JUDICIAL POLICE  
DEPARTMENT  
NO. 0086/2007  
[signature]

Judicial Police Officer residing in Nîmes

- We are located at the headquarters of the Montpellier Regional Judicial Police Department –  
- Prosecuting the enforcement of the rogatory letter issued on 1 May 2009 by Ms. Cécile YOUL PAILES, Vice President of Investigations at the Regional Court (*Tribunal de Grande Instance*) of Montpellier, conducting an investigation against X on the grounds of Violation of secrecy or privacy using a camera-

- In view of articles 81, 151 *et seq.* of the Code of Criminal Procedure –  
- Assisted by Deputy Principal Inspector Marc ZELLER and Inspector Franck PALIAS of the Judicial Security Police Group of Vaud (Switzerland)-  
- Cause the person named below to appear before us who states the following:-

**- WITH REGARD TO HIS IDENTITY-**

- "My name is Jean Antoine BONNAVEAU-  
- I was born on 3 December 1958 in Cannes (France)-  
- I am the son of Jean Marcel and Jacqueline Menguy-  
- I reside at 2 avenida de la francia 46023 Valencia Spain-  
- I am a French national but I am a resident of Spain-  
- I am married and have lived with Victoria Mac Feidh for 6 years; we currently live in Spain at the address I provided to you-  
- I have a two-year old child who is my dependent-  
- I am employed as a Sail Analyst, in other words, a sailmaker -  
- I have been employed by the company BMW Oracle Racing since December 2007-  
- I receive a salary of 10,000 euros per month-  
- I have received a degree at the secondary educational level (BEPC) -  
- I did not complete my military service, I was released from duty-  
- I have a category B driver's license issued in 2004 by the Prefecture of Hérault-  
- I have not filed a declaration for possession of firearms-  
- I am not known by any Police or Gendarmerie services "-

**-WITH REGARD TO THE FACTS-**

- "I take official note that you are presenting me once again with the rogatory letter under which you are acting-  
-I take official note that I am being heard in the context of a case of violation of secrecy or privacy using a camera-  
-I take formal note of the allegations made against me and consent to explain myself-

[5 signatures]

- **Question: Do you acknowledge that you were in Villeneuve in particular on 28 April 2009?**-

- **Answer:** Yes. I went there in my own car, a Volvo with license plate no. 4826 ZE 34---

- I arrived in Montreux on Monday evening, 27 April 2009 at around 8:00 PM. I spent the night at the "Bon Port" hotel in Montreux. The next morning, at around 10:00 AM, I went to the Alinghi site in Villeneuve---

- **Question: For what reason?---**

- **Answer:** I went there to take photos of the Alinghi facilities and possibly photos of boat components in movement during transit between a workshop and the tents, which I suppose are places where the boats are assembled---

- I acknowledge that I also recorded some measurements to do an estimate of the characteristics of the Alinghi project---

- I specify that I successfully took the dimensions of the tents, and I took the dimensions of additional items, such as the distance between lamp posts, dimensions of the buildings nearby, all to make some comparisons---

- I stayed on the site the entire day of 28 April 2009 and the morning of 29 April 2009---

- On the morning of 28 April 2008 [sic] I went to the highlands of Villeneuve, in the vineyards that dominated the industrial area where Alinghi is located, to take some photos---

- I went down again into the industrial area and made several rounds for location scouting, always in the car. I identified the offices of Décision or Alinghi, thanks to Alinghi's staff whom I identified by their clothing---

- At that time, after observing the location and size of the building, I deduced that large-sized components, such as hulls, must not have been manufactured on that site---

- In the afternoon I went back up into the vineyards to find another observation point where I stayed for about twenty minutes. I took some snapshots---

- Then I went back down, went to a parking space to rest and after I decided to go to survey the location up closer, along the tents---

- I parked my car in a parking lot across the street, I took a photo of the tent and then I took a few range-finder measurements of the adjacent buildings. I also plotted the GPS location of all the measuring points in order to later be able to be more precise to improve the proportions deduced from the photos.-

- At that time, I noticed that I was being followed by Brett Ellis, who is one of the Alinghi designers---

- He had a video camera on his shoulder; he was filming me while I was moving around.---

- I returned to my car, he filmed the interior of my car and my license plates and was filming me personally---

- He was immediately next to my car---

- I said hello to him, I made some small talk with him, he answered me and explained to me that there was a lot of security around the site. I told myself that it wasn't going to be easy. I got in my car and I left. He continued to film me until I left the area---

[stamp:]  
CERTIFIED TRUE COPY

Judicial Police Officer  
NATIONAL POLICE  
MONTPELLIER  
REGIONAL JUDICIAL POLICE  
DEPARTMENT  
NO. 0086/2007  
[signature]

[5 signatures]

- On 29 April 2009, I went back to the vineyards. At that time, I thought that I needed a private and permanent observation point. I went through a village and I saw an apartment building where there was a "for rent" sign. I took a photo, that could be interesting---
- Going back down to the Alinghi site, I noticed that this apartment would not be suitable as an observation point, because the site was hidden by vegetation-
- Then I went back behind the Alinghi site, near the tents to take more photos of the blowers, or rather the dust exhausters. These were located all along the tent that I believe is the one used for the masts, given its height---
- I specify that all of my movements on this site were recorded on GPS, all the photos on SD cards and all the voice recordings on my digital voice recorder--
- During those two days, I had telephone contacts on my Nokia brand cell phone whose number is 0034 690 257 117, PIN code 9300 ---
  
- I did all that in the context of my work, for my employer BMW Oracle Racing---
- This company is a competitor of Alinghi---
- I specify that I was officially authorized by my company to carry out this reconnaissance. In fact, I am part of the design team but the entire staff can provide useful information, particularly on opposing teams. We call that a "recon cell" for reconnaissance---
- The person who authorized me is Manolo RUIZ DE ELVIRA, who is a designer---
- All that was done verbally, in Valencia. It is a group decision-
- I specify that this type of information gathering on the competition is routine, even Alinghi does it this way---
- Furthermore, at the end of 2008 during the period of putting our own boat in the water in Anacortes in the United States (Washington) and during our training in San Diego, we had to put up with the constant, bothersome presence of the Alinghi information team---
- I also want to specify that considering the images freely available on the Internet concerning the facilities inside the tent on the Alinghi site, I did not think that my photos of the outside of the tent could be criminal in nature -
- I am referring in particular to the photos of the concrete structures put in place under the tent, which make it possible to determine certain characteristics of the boat---
  
- **Question: What use did you intend for the information you obtained?**
- **Answer:** I made two reports. I did not collect information critical for Alinghi, or frankly decisive for Oracle. What is circulating on the Internet is much more specific than what I was able to observe. I did not see the hulls, for example---
- These reports were intended for the Oracle design team so that they could evaluate everything that might have been there, in particular the technical characteristics of the competing project---

[stamp:]  
CERTIFIED TRUE COPY

Judicial Police Officer  
NATIONAL POLICE  
MONTPELLIER  
REGIONAL JUDICIAL POLICE  
DEPARTMENT  
NO. 0086/2007  
[signature]

[5 signatures]

- Question: Have you already transmitted the information obtained to third parties? If yes, in what manner, from where, when and for whom?-
- Answer: The two reports that I just spoke to you about were sent by e-mail from my laptop computer, the first on the evening of 28 April 2009 to Manolo RUIZ DE ELVIRA, and the second on 30 April 2009 to Manolo also---
- We also had several telephone conversations with Manolo, on location in Villeneuve but also here---
- I also have been in telephone contact from here with Julien DI BIASE, who is part of the navigating team---
  
- I take official note that you are showing me sealed exhibit number ONE, namely, a Garmin 60 GPS that you seized during the search---
- That belongs to Oracle, like all the optical equipment that you were able to see among my things---
- All my physical movements on the premises are recorded on it---
- I take official note that this sealed exhibit will be submitted to the Swiss police departments for their use---
  
- I take formal note that you are showing me sealed exhibit number TWO, namely, a Nokia brand cell phone, number 0034 690257117---
- This telephone belongs to me; it is the one I used during my trip to Switzerland---
- I take official note that this sealed exhibit will be submitted to the Swiss police departments for their use---
  
- I take formal note that you are showing me sealed exhibit number THREE, namely, an Olympus brand digital voice recorder---
- This belongs to me and I used it to take notes on the Alinghi site-
- I take official note that this sealed exhibit will be submitted to the Swiss police departments for their use---
  
- I take formal note that you are showing me sealed exhibit number FOUR, namely, 4 paper documents bearing photographs of the Alinghi site---
- These documents were given to me by Manolo a few days before my trip to Switzerland. These photographs were probably taken by another member of the design team. They were supposed to help me recognize the site---
- I do not know who took these photos or when---
  
- I take formal note that you are showing me sealed exhibit number FIVE, namely, a Lenovo brand laptop computer---
- This belongs to me; it contains all the data collected relating to Alinghi, in particular the photos, the GPS data and the two reports mentioned earlier---
- I take official note that on the decision of the investigating judge, this seal number FIVE is broken in order to return it after use---
- I take official note that you are giving a USB key to me on which, in your presence, I am copying all the documents relating to this case---
- In evidence of good faith, I am also copying on the USB key files relating only to my relationship with Oracle---

[stamp:]  
CERTIFIED TRUE COPY

Judicial Police Officer  
NATIONAL POLICE  
MONTPELLIER  
REGIONAL JUDICIAL POLICE  
DEPARTMENT  
NO. 0086/2007  
[signature]

[5 signatures]

- Question: Do you have anything else to add?---

- Answer: I never thought of going beyond the context of the America's Cup competition, the fact of being insistent and bothersome in order to obtain technical and sport-related information on the competition has been part of the event for 150 years---

- Since 1987 I have been in this environment of the America's Cup, I have always known about these practices---

- I did not think I was in violation by doing what I was doing."---

- After reading this report, Jean Antoine BONNAVEAU confirms it and signs it with us at seven o'clock in the evening---

Jean Antoine BONNAVEAU	The assistants	The Judicial Police Officer
[signature]	[signature]	[signature]

-Therefore, it follows that---

- We are attaching the sheet for broken seal number FIVE corresponding to the accused party's laptop computer---

- Reference of which is made---

The Judicial Police Officer  
[signature]

[stamp:]  
CERTIFIED TRUE COPY

Judicial Police Officer  
NATIONAL POLICE  
MONTPELLIER  
REGIONAL JUDICIAL POLICE  
DEPARTMENT  
NO. 0086/2007  
[signature]





CANTON DE VAUD

Justice pénale

Pièce 3

Page 1  
Edition du 06.05.2009

Affaire : PE09.010087

PROCES-VERBAUX DES AUDITIONS

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PREVENU(S)

BONNAVEAU

Jean Antoine

REPertoire

BONNAVEAU

Jean Antoine

1

\* \* \* \* \*



REPUBLIQUE FRANCAISE  
MINISTERE DE L'INTERIEUR

DIRECTION GENERALE LA POLICE  
NATIONALE

S.R.P.J. MONTPELLIER  
Antenne de Nîmes

P.V.n° 2009/ 38617

**AFFAIRE :**

Contre/X...

**OBJET :**

AUDITION  
de  
BONNAVEAU Jean Antoine

**PROCES - VERBAL**

1

COPIE

L'an deux mille neuf,  
le premier mai  
A dix sept heures

Nous, LONCQ Stéphanie  
Brigadier Chef de Police  
En fonction au S.R.P.J. de MONTPELLIER,  
Antenne de Police Judiciaire de Nîmes

Officier de Police Judiciaire en résidence à Nîmes

---Nous trouvant dans les locaux du S.R.P.J. De Montpellier---  
---Poursuivant l'exécution de la commission rogatoire délivrée le 01/05/2009  
par Mme YOUL PAILHES Cécile, Vice Président de l'Instruction au Tribunal de  
Grande Instance de Montpellier, informant contre X du chef de Violation du  
domaine secret ou du domaine privé au moyen d'un appareil de prise de vues---  
---Vu les articles 81, 151 et suivants du Code de Procédure Pénale---  
---Assisté de l'Inspecteur Principal Adjoint ZELLER Marc et de l'Inspecteur  
PALIAS Franck, du Groupe Judiciaire Police de Sûreté de Vaud (Suisse)---  
---Faisons comparaître devant nous la personne ci-après dénommée qui nous  
déclare:---

---SUR SON IDENTITE---

--- »Je me nomme BONNAVEAU Jean Antoine---  
---Je suis né le 03/12/1958 à Cannes---  
---Je suis fils de Jean Marcel et de Menguy Jacqueline---  
---Je suis domicilié 2 avenida de la francia 46023 VALENCIA Espagne---  
---Je suis de nationalité française mais je suis résident espagnol---  
---Je vit maritalement avec Victoria Mac Feidh depuis 6 ans, nous vivons  
actuellement en Espagne à l'adresse que je vous ai fournie---  
---J'ai un enfant de 2 ans, il est à ma charge---  
---J'exerce la profession de Sail Analyst, c'est à dire voilier---  
---Je suis employé par la société BMW ORACLE RACING, depuis décembre  
2007---  
---Je perçois un salaire de 10 000 euros mensuel---  
---J'ai un niveau d'études BEPC---  
---Je n'ai pas effectué mes obligations militaires, j'ai été réformé---  
---Je suis titulaire d'un permis de conduire de catégorie B délivré en 2004 par  
Préfecture de l'Hérault---  
---Je n'ai pas fait de déclaration pour une détention d'armes---  
---Je suis inconnu des services de Police ou Gendarmerie »---

---SUR LES FAITS---

--- »Je prends acte que vous me présentez de nouveau la commission rogatoire  
en vertu de laquelle vous agissez---  
---Je prends acte que je suis entendu dans le cadre d'une affaire de violation  
du domaine secret ou du domaine privé au moyen d'un appareil de prise de  
vues---  
---Je prends acte des faits qui me sont reprochés et consens à m'expliquer---

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---Question: Reconnaissez vous avoir été à Villeneuve notamment le 28 avril 2009?---

---Réponse: Oui. Je m'y suis rendu avec mon véhicule personnel, la volvo immatriculé 4826 ZE 34---

---Je suis arrivé à Montreux lundi soir, le 27/04/2009 vers 20h00. J'ai passé la nuit à l'hôtel « bon port » à Montreux. Le lendemain matin, vers 10h00, je me suis rendu sur le site Alinghi à Villeneuve---

---Question: Pour quels motifs?---

---Réponse: J'y suis allé pour faire des photos des installations de ALINGHI et éventuellement des photos de pièces de bateau en mouvement lors de transit entre un atelier et les tentes, que je suppose être les lieux d'assemblage du bateau---

---Je reconnais que j'ai également procédé à un relevé de mesures, pour faire une estimation des caractéristiques du projet ALINGHI---

---Je précise que j'ai réussi à prendre les dimensions des tentes, et j'ai pris les dimensions d'éléments annexes tels que distance entre lampadaires, dimensions de bâtiments aux environs, tout cela pour faire des comparaisons---

---Je suis resté sur le site toute la journée du 28/04/2009 et le matin du 29/04/2009---

---Le 28/04/2008 au matin je me suis rendu sur les hauteurs de Villeneuve, dans les vignes qui dominaient la zone industrielle où se situe Alinghi, pour prendre des photos---

---Je suis redescendu dans la zone industrielle, j'ai fait plusieurs tours de repérage, toujours en véhicule. J'ai identifié les bureaux de Décision ou Alinghi, grâce à du personnel d'Alinghi que j'ai repéré à leur habillement---

---A ce moment, après avoir bien observé les lieux et la taille du bâtiment, j'en ai déduit que les éléments de grande taille, comme les coques, ne devaient pas être fabriqués sur ce site---

---L'après midi je suis remonté dans les vignes, pour trouver un autre endroit d'observation sur lequel je suis resté une vingtaine de minutes. J'y ai pris des clichés photographiques---

---Je suis ensuite redescendu, je me suis posé sur un parking pour me reposer et après j'ai décidé d'aller reconnaître les lieux, plus près, le long des tentes---

---J'ai garé ma voiture sur un parking en face, j'ai pris une photo de la tente et ensuite j'ai fait quelques mesures au télémètre des bâtiments adjacents. J'ai également fait un tracé GPS de tous les points de mesure, pour pouvoir ensuite être plus précis pour améliorer les proportions déduites des photos---

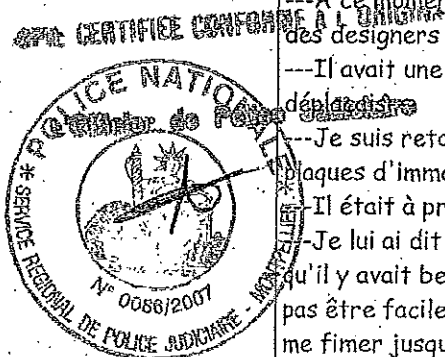
---A ce moment, je me suis aperçu que j'étais suivi par Brett Ellis, qui est un des designers d'Alinghi---

---Il avait une caméra vidéo sur l'épaule, il me filmait pendant que je me déplaçais

---Je suis retourné à ma voiture, il a filmé l'intérieur de mon véhicule et mes plaques d'immatriculation et me filmait personnellement---

---Il était à proximité immédiate de mon véhicule---

---Je lui ai dit bonjour, je lui ai dit des banalités, il me répondait et m'a précisé qu'il y avait beaucoup de sécurité autour du site. Je me suis dit que cela n'allait pas être facile. Je suis monté dans mon véhicule et je suis parti, il continuait à me filmer jusqu'à mon départ de la zone---



*[Handwritten signatures]*

---Le 29/04/2009, je suis repassé par les vignes. A ce moment là j'ai pensé qu'il me fallait un poste d'observation privé et permanent. Je suis passé par un village et j'ai vu un immeuble d'appartement où il y avait un panneau « à louer ». J'ai pris une photo, cela pouvait être intéressant---

---En redescendant vers le site Alinghi, je me suis aperçu que cet appartement ne conviendrait pas comme point d'observation, le site était caché par la végétation---

---Ensuite je suis repassé derrière le site Alinghi, à proximité des tentes pour reprendre quelques photos de ventilateurs, ou plutôt des aspirateurs de poussière. Ceux ci se trouvaient le long d'une tente que je crois être celle dédiée aux mâts, vu sa taille---

---Je précise que tous mes déplacements sur ce site ont été enregistrés sur GPS, toutes les photos sur cartes SD et tous les enregistrements vocaux sur mon dictaphone numérique---

---Durant ces deux jours, j'ai eu des contacts téléphoniques sur mon portable de marque Nokia dont le numéro d'appel est le 0034 690 257 117, code PIN 9300---

---Si j'ai fait tout cela dans le cadre de mon travail, pour mon employeur BMW ORACLE RACING---

---Cette société est concurrente d'Alinghi---

---Je précise que j'ai été mandaté officiellement par ma société pour effectuer ces reconnaissances. En fait je fais partie de l'équipe de design mais tout le staff peut apporter des renseignements utiles, notamment sur les équipes adverses. On appelle cela « une cellule recon » pour reconnaissance---

---La personne qui m'a mandaté est RUIZ DE ELVIRA Manolo qui a la fonction de designer---

---Tout cela a été fait verbalement, à Valence. C'est une décision collégiale---

---Je précise que ce genre de collecte d'information sur les concurrents est courant, de plus même Alinghi procède de cette manière---

---D'ailleurs, fin 2008 pendant la période de mise à l'eau de notre propre bateau à Anacortes aux Etats Unis (Washington) et pendant nos entrainements à San Diego, nous avons eu à souffrir de la présence persistante et pesante de l'équipe de renseignements d'Alinghi---

---Je tiens aussi à préciser que compte tenu des images disponibles librement sur internet, concernant les installations à l'intérieur de la tente, sur le site de Alinghi, je n'ai pas pensé que mes photos de l'extérieur de la tente pouvaient avoir un caractère délictueux---

---Je me réfère notamment aux photos des structures en béton mises en place sous la tente qui permettent de déterminer certaines caractéristiques du bateau---

---Question: Quel usage entendiez vous faire des renseignements obtenus?---

---Réponse: J'ai fait deux rapports. Je n'ai pas collecté d'informations critiques pour Alinghi, ni franchement déterminantes pour Oracle. Ce qui circule sur internet est beaucoup plus précis que ce que j'ai pu observer. Je n'ai pas vu les coques par exemple---

---Ces rapports étaient destinés au design team d'Oracle de manière à évaluer tout ce qui aurait pu être, notamment les caractéristiques techniques du projet concurrent---

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---Question: Avez vous déjà transmis des informations obtenues à des tiers? Si oui de quelle manière, d'où, quand et pour qui?---

---Réponse: Les deux rapports dont je viens de vous parler ont été envoyés par mail, à partir de mon ordinateur portable; le premier le 28/04/2009 au soir à Manolo RUIZ DE ELVIRA, et le second le 30/04/2009, à Manolo également---

---Nous avons eu également de multiples communications téléphoniques avec Manolo, sur place à Villeneuve mais aussi ici---

---J'ai également été en contact téléphonique depuis ici avec Julien DI BIASE, qui fait partie de l'équipe navigante---

---Je prends acte que vous me représentez le scellé numéro UN, à savoir un GPS Garmin 60, que vous avez saisi lors de la perquisition---

---Celui-ci appartient à Oracle, tout comme le matériel d'optique que vous avez pu voir dans mes affaires---

---Tout mon parcours physique sur les lieux y est enregistré---

---Je prends acte que ce scellé sera remis aux services de police suisses pour exploitation---

---Je prends acte que vous me représentez le scellé numéro DEUX, à savoir un téléphone portable de marque Nokia, numéro 0034 690257117---

---Ce téléphone m'appartient, c'est celui que j'ai utilisé lors de mon déplacement en Suisse---

---Je prends acte que ce scellé sera remis aux services de police suisses pour exploitation---

---Je prends acte que vous me représentez le scellé numéro TROIS, à savoir un dictaphone numérique de marque Olympus---

---Celui-ci m'appartient et je l'ai utilisé pour prendre des notes sur le site Alinghi---

---Je prends acte que ce scellé sera remis aux services de police suisses pour exploitation---

---Je prends acte que vous me représentez le scellé numéro QUATRE, à savoir 4 documents papier supportant des photographies du site Alinghi---

---Ces documents m'ont été remis par Manolo quelques jours avant mon déplacement en Suisse. Ces photographies ont été prises probablement par un autre membre du design team, elles devaient m'aider à reconnaître le site---

---Je ne sais pas qui a pris ces photos, ni quand---

---Je prends acte que vous me représentez le scellé numéro CINQ, à savoir un ordinateur portable de marque LENOVO---

---Celui-ci m'appartient, il contient toutes les données recueillies relatives à Alinghi, notamment les photos, les traces GPS et les deux rapports mentionnés ci-dessus---

---Je prends acte que sur décision du magistrat instructeur, ce scellé numéro CINQ est brisé aux fins de restitution après exploitation---

---Je prends acte que vous me remettez une clef USB sur laquelle, en votre présence, je copie tous les documents relatifs à cette affaire---

---Pour preuve de bonne foi, je vous copie également sur la clef USB des fichiers relatifs uniquement avec ma relation avec Oracle---

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*[Handwritten signature]*

---Question: Avez vous autre chose à ajouter?---

---Réponse: Je n'ai jamais pensé sortir du cadre de la compétition qu'est l'America s Cup, le fait d'être insistant et pesant pour obtenir les informations techniques et sportives sur les concurrents fait partie de l'événement depuis 150 ans---

---Depuis 1987 que je suis dans ce milieu de l'America s Cup, j'ai toujours connu ces pratiques---

---Je ne pensais pas être en infraction en faisant ce que j'ai fait »---

---Après lecture faite par lui-même, Mr BONNAVEAU Jean Antoine persiste et signe avec nous le présent à dix neuf heures---

BONNAVEAU Jean Antoine

Les assistants.

L'O.P.J.

---De même suite---

---Annexons au présent la fiche du scellé brisé numéro CINQ correspondant à l'ordinateur portable de l'intéressé---

---Dont mention---

L'Officier de Police Judiciaire

COPIE CERTIFIEE CONFORME A L ORIGINAL



Officier de Police Judiciaire