

MR. CAMERON, EXAM. BY MR. HEBERT

1 agreement would not be enforced. And so that if the
2 company came forward and denied that there was any such
3 agreement, that that would simply not be true.

4 A. I'm -- what I'm saying is Gerald Phillips was well
5 aware that the company was not -- and we have it in
6 evidence, Commissioner, you've seen it repeated it over
7 and over again by officials. The company was well aware
8 that they were not ever to get any money from the take-
9 or-pay agreement.

10 Q. All right. And that was the understanding. That
11 was, in fact, the agreement between you and Phillips and
12 Marvin Pelley?

13 A. Well, it was -- Phillips repeated it in front of
14 staff, everyone.

15 Q. All right. So --

16 A. That wasn't just an agreement between us.

17 Q. All right, fair enough. But if he comes in here and
18 says that, "Look, there was no agreement between Donald
19 Cameron and myself that the take-or-pay agreement would
20 not be enforced and the company would not get one red
21 cent," then he -- that's simply not true?

22 A. I can't speculate what Mr. Phillips will say.

23 Q. But if he says it, because he obviously --

24 A. What I'm going to say in a more positive way is that
25 Gerald Phillips understood fully that the company would