



U.S. Department of Justice

Antitrust Division

New York Office

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November 15, 2022

Jesse Cook-Dubin, Esq.
Cohen Kinne Valicenti & Cook LLP
28 North Street, 3rd Floor
Pittsfield, MA 01201

Re: United States v. Paul M. Camara, Jr.
Case No. 3:19CR189 (KAD)

Dear Attorney Cook-Dubin,

This letter serves as a Plea Agreement Supplement to the Plea Agreement, dated July 17, 2019 (docket # 5), in the above case between your client, Paul M. Camara, Jr ("defendant"), and the United States Department of Justice Antitrust Division and the United States Attorney's Office for the District of Connecticut ("the Government"). Notwithstanding anything to the contrary in the Plea Agreement, the Government and the defendant agree to the provisions below.

STIPULATION OF REASONABLY FORESEEABLE FRAUD LOSS

The defendant and the Government stipulate that the defendant inflated his bid prices by approximately 5% on \$29,435,800 in insulation contracts as a result of the agreements to rig bids and engage in fraud that give rise to the defendant's guilty plea to Counts One and Two of the Information in the above case (docket #1). Consequently, the fraud loss on each affected project was approximately 5% of the contract amount and at least \$1,471,790 altogether for the affected projects.

NO OTHER PROMISES

The defendant acknowledges that no other promises, agreements, or conditions have been entered into other than those set forth in this Plea Agreement Supplement and the Plea Agreement, and none will be entered into unless set forth in writing, signed by all the parties.

This letter shall be filed in this case.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MG', is positioned above a solid horizontal line.

MILOSZ GUDZOWSKI
TRIAL ATTORNEY
U.S. DEPARTMENT OF JUSTICE
ANTITRUST DIVISION

A handwritten signature in blue ink, appearing to read 'D. Novick', is positioned above a solid horizontal line.

DAVID E. NOVICK
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF CONNECTICUT


The defendant certifies that he has read this letter or has had it read or translated to him, that he has had ample time to discuss it with counsel and that he fully understands and accepts its terms.



Paul M. Camara, Jr.
The Defendant

11/15/22
Date

I have thoroughly read, reviewed and explained this letter to my client who advises me that he understands and accepts its terms.



JESSE COOK-DUBIN, ESQ.
Attorney for the Defendant

11/15/22
Date