IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

BOARD OF TRUSTEES of the PIPE FITTERS)
RETIREMENT FUND, LOCAL 597;)
BOARD OF TRUSTEES of the PIPE FITTERS) CIVIL ACTION
WELFARE FUND, LOCAL 597;)
BOARD OF TRUSTEES of the PIPE FITTERS)
TRAINING FUND, LOCAL 597; the) NO.: 09-CV-6919
BOARD OF TRUSTEES of the CHICAGO AREA)
MECHANICAL CONTRACTING INDUSTRY)
IMPROVEMENT TRUST;) JUDGE: ANDERSEN
THE PIPE FITTERS' ASSOCIATION,)
LOCAL 597 U.A.; BOARD OF TRUSTEES)
of the PIPE FITTERS' INDIVIDUAL) MAGISTRATE
ACCOUNT and 401(K) PLAN; and) JUDGE: SCHENKIER
BOARD OF TRUSTEES of the PIPE FITTING)
COUNCIL OF GREATER CHICAGO;)
)
Plaintiffs,)
V\$.)
•)
MONARCH HVAC, INC.,)
an Illinois Corporation;)
_ ^ .)
Defendant.)

AFFIDAVIT OF GREG WATSON

I, Gregory J. Watson, hold the title of Collection Coordinator for the PIPE FITTERS' RETIREMENT FUND, LOCAL 597, the PIPE FITTERS WELFARE FUND, LOCAL 597, the PIPE FITTERS' TRAINING FUND, LOCAL 597, the CHICAGO AREA MECHANICAL CONTRACTING INDUSTRY IMPROVEMENT TRUST, the PIPE FITTERS' INDIVIDUAL ACCOUNT and 401(K) PLAN, the PIPE FITTING COUNCIL OF GREATER CHICAGO ("TRUST FUNDS") and the PIPE FITTERS ASSOCIATION, LOCAL 597 U.A. ("UNION"). Being first duly sworn, on oath state that to the best of my knowledge the following is an accurate statement as to the Defendant's delinquency and the costs that the TRUST FUNDS and



UNION have incurred in the above-captioned matter:

 Defendant MONARCH HVAC, INC. ("MONARCH") owes the Plaintiffs \$16,273.91 in unpaid contributions, liquidated damages and interest charges revealed in an audit conducted in January 20101.

Defendant MONARCH owes the TRUST FUNDS and UNION \$14,815.21 in unpaid
 liquidated damages for the time period of October 2008 through November 2009.

- 3. Defendant MONARCH owes the Plaintiffs an additional \$1,590.01 in liquidated damages and \$1,468.04 in interest charges for the time period of November 2009 through present.
- 4. Defendant MONARCH owes the TRUST FUNDS and UNION \$3,933.27 in unpaid 401(k) liquidated damages and \$154.95 in unpaid 401(k) interest for the time period of May 2008 through November 2009.
- Defendant MONARCH owes the Plaintiffs \$3,618.14 in reasonable attorney's fees pursuant to the terms of the Collective Bargaining Agreement, Trust Agreements and 29 U.S.C. § 1132(g)(2)(D).
- 6. The known total aggregate amount currently owed to Plaintiffs by Defendant MONARCH is \$41,853.53.

Subscribed and sworn

before me this 26 day of

February, 2010

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Gail F. Hanser

Notary Public

Further, the affiant saith not.

Mr. Gregory J. Watson

OFFICIAL SEAL
GAIL P HANSEN
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPRES:02/10/14