

**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 WELFARE FUND, LOCAL 597;)	CIVIL ACTION
BOARD OF TRUSTEES of the PIPE FITTERS TRAINING FUND, LOCAL 597; the)	NO.: 10-CV-3790
BOARD OF TRUSTEES of the CHICAGO AREA MECHANICAL CONTRACTING INDUSTRY IMPROVEMENT TRUST;)	JUDGE: CASTILLO
THE PIPE FITTERS' ASSOCIATION, LOCAL 597 U.A.; BOARD OF TRUSTEES of the PIPE FITTERS' INDIVIDUAL ACCOUNT and 401(K) PLAN; and)	MAGISTRATE JUDGE: FINNEGAN
BOARD OF TRUSTEES of the PIPE FITTING COUNCIL OF GREATER CHICAGO,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
ALEXANDER GAMMIE ASSOCIATES PLUMBING & HEATING COMPANY; an Illinois Corporation; and FRANK E. HEROUT an Individual;)	
)	
Defendants.)	

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 Defendants' delinquency and the costs that the TRUST FUNDS and UNION have incurred



in the above-captioned matter:

1. Defendants ALEXANDER GAMMIE and HEROUT currently owe the TRUST FUNDS and UNION \$91,493.04 in unpaid principal under a defaulted Settlement Agreement.
2. Defendants ALEXANDER GAMMIE and HEROUT currently owe the TRUST FUNDS and UNION \$8,806.93 in liquidated damages as a result of their default on the Settlement Agreement pursuant to the terms of the Settlement Agreement.
3. Defendants ALEXANDER GAMMIE and HEROUT currently owe the TRUST FUNDS and UNION \$21,314.04 in unpaid contributions for the months of February, May and June 2010.
4. Defendants ALEXANDER GAMMIE and HEROUT currently owe the TRUST FUNDS \$3,357.15 in unpaid liquidated damages and \$184.28 in unpaid interest for the time period of January of 2010 through present pursuant to the terms of the Collective Bargaining Agreement and Trust Agreements.
5. Defendants ALEXANDER GAMMIE and HEROUT currently owe the PIPE FITTERS' INDIVIDUAL ACCOUNT and 401(k) PLAN \$172.07 in unpaid 401(k) liquidated damages and \$30.44 in unpaid 401(k) interest.
6. Defendants ALEXANDER GAMMIE and HEROUT currently owe the TRUST FUNDS and UNION \$4,316.75 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).
7. Defendant ALEXANDER GAMMIE remains bound by the Collective Bargaining Agreement and has a continuing obligation to report all hours worked by its covered employees to the TRUST FUNDS and UNION.

Subscribed and sworn before me this 28 day of July, 2010

Gail P. Hansen
Notary Public

Further, the affiant saith not.

Gregory J. Watson
Mr. Gregory J. Watson

