

# Exhibit

# A

**IN THE NORTHERN DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS BENEFIT FUND,	)	
BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS PENSION FUND,	)	
BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS EDUCATION	)	
FUND, BOARD OF TRUSTEES OF	)	No. 13 CV 170
THE NORTHERN ILLINOIS	)	
RETIREMENT FUND,	)	Judge Chang
	)	
Plaintiffs,	)	Magistrate Judge Finnegan
	)	
v.	)	
	)	
ZEBRA PLUMBING SERVICES, LLC,	)	
an Illinois limited liability company,	)	
	)	
Defendant.	)	

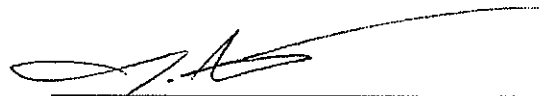
**AFFIDAVIT**

I, James Vasilakos, upon being first duly sworn, on oath depose and state:

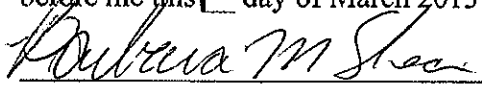
1. Affiant is an auditor for the Plaintiffs' auditing firm, Bansley & Kiener.
2. On February 13, 2013, I performed an ERISA fringe benefit contributions audit for Plaintiffs, on Defendant, Zebra Plumbing Services, LLC, for the period August 1, 2011 through January 31, 2013.
3. My audit found arrears owing to the Plaintiffs as follows:
  - a. \$506.60 in Union dues;
  - b. \$2,900.88 in Pension Fund contributions;
  - c. \$1,139.01 in Retirement Fund contributions;
  - d. \$2,881.01 in Health & Welfare Fund contributions;
  - e. \$458.29 in Education Fund contributions;
  - f. \$99.17 in Industry Fund contributions;
  - g. \$26,80 in International Training Fund contributions;
  - h. \$801.18 in liquidated damages based on Zebra's failure to timely pay the amounts identified in the audit;
4. A copy of my audit report's findings is attached to my affidavit.

5. I additionally became aware of \$276.10 due to the Funds for liquidated damages for contributions outside of the audit findings paid late.
6. Our firm charged the Plaintiffs \$850.35 to perform the audit.
7. The total presently due to the Plaintiffs including late fees/liquidated damages of, but excluding attorney's fees and court costs is \$9,939.39.
8. Affiant is not currently suffering any infirmities and is competent to testify to all the foregoing

FURTHER AFFIANT SAYETH NAUGHT

  
James Vasilakos

SUBSCRIBED AND SWORN  
before me this 1<sup>ST</sup> day of March 2013

  
Notary Public

