

EXHIBIT D
Sworn Declaration of John Libby

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

TRUSTEES of the CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS PENSION FUND,)	
CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS WELFARE FUND, CHICAGO)	
REGIONAL COUNCIL OF CARPENTERS)	
SUPPLEMENTAL RETIREMENT FUND, and)	
CHICAGO REGIONAL COUNCIL OF CARPENTERS)	
APPRENTICE TRAINING FUND,)	
)	Case 15 cv 9509
Plaintiffs,)	
v.)	Judge Darrah
)	
EMCO INTERIORS, INC.,)	
)	
Defendants.)	

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

NOW COMES JOHN LIBBY, who after being duly sworn upon oath, states as follows:

1. I am the Manager of Audits and Collections for the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago Regional Council of Carpenters Supplemental Retirement Fund, and the Chicago Regional Council of Carpenters Apprentice Training Fund ("Trust Funds") and in such capacity I am authorized to make this Affidavit on behalf of the Plaintiff Trust Funds.

2. The Trust Funds receive contributions from numerous employers pursuant to Collective Bargaining Agreements between the employers and the Chicago Regional Council of Carpenters, ("Union"), and therefore, are multiemployer plans. (29 U.S.C. §1002). The Trust Funds are administered at 12 East Erie, Chicago, Illinois and venue is proper in the Northern District of Illinois.

3. The Defendants are employers engaged in an industry affecting commerce that entered into a Collective Bargaining Agreement whose terms require the Defendants to pay fringe benefits to the Trust Funds.

4. The Collective Bargaining Agreement also binds the Defendants to the provisions of the Agreement and Declarations of Trust that created the Trust Funds ("Trust Agreements").

5. The Defendants are required to make contributions to the Trust Funds for each hour worked by its carpenter employees at the rate and in the manner specified in the Collective Bargaining Agreements and Trust Agreements. In addition, the Defendant is required to make contributions to the Trust Funds measured by the hours worked by subcontractors that are not signatory to a Collective Bargaining Agreement with the Union.

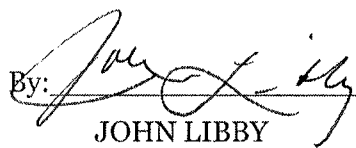
6. The Parties submitted an Agreed Order of Dismissal to this Court, which was entered by Judge Darrah on January 12, 2016. The Agreed Order of Dismissal provided for the Defendants to remit \$69,545.88 to the Trust Funds in five installments.

7. The Defendants violated Paragraph 1 of the January 12, 2016 Agreed Order of Dismissal by failing to pay the Plaintiffs in accordance with the payment plan as provided in the Agreed order of Dismissal.

8. The Defendants currently owes \$46,363.92 to the Trust Funds.

9. Plaintiffs have been required to employ attorneys to collect on the Agreed Order of Dismissal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

By:  10/10/16
JOHN LIBBY
Manager; Audits and Collections