

EXHIBIT 3

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

TRUSTEES OF THE CHICAGO PAINTERS AND	)	
DECORATORS PENSION FUND, et al	)	
Plaintiffs,	)	Case No. 16 CV 7533
v.	)	
	)	
REGENCY GROUP OF ILLINOIS, INC., a dissolved	)	
Illinois corporation, and JOSEPH CAMPISI, Individually,	)	
	)	Judge Kennelly
	)	Magistrate Judge Valdez
Defendants.	)	

**AFFIDAVIT**

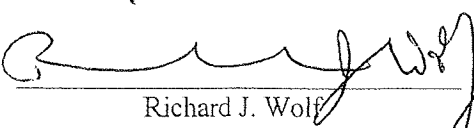
I, Richard J. Wolf, upon being first duly sworn, on oath deposes and states:

1. Affiant is President of the auditing firm of Richard J. Wolf & Company, Inc.
2. Our firm completed a revised compliance audit for the Trustees of the Chicago Painters and Decorators, et. al., on Regency Group of Illinois for the period October 1, 2014 through August 31, 2016.
3. The audit report found arrears owing to the Trustees of the Chicago Painters and Decorators, et. al., in the amount of \$103,187.69 in contributions, \$15,478.15 liquidated damages, and \$1,680.00 in audit costs for a total of \$120,345.84.
4. According to the provisions of the Labor Agreement, employers such as Regency Group of Illinois are required to timely pay their fringe benefit fund contributions when they become due, and liquidated damages are assessed on those contributions. According to the records of the Funds', The Defendant Regency Group of Illinois has been tardy in making its contributions for work months from October 2014 through March, 2016, and owes Plaintiffs the amount of \$38,639.83 on those delinquent contributions. See Exhibit 1.
5. The total due the Plaintiffs including arrears, and liquidated damages of 15 percent, but excluding attorney's fees and court costs is **\$158,985.67** for Chicago Painters and Decorators, et.

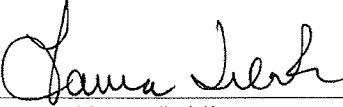
Al, not including any interest, or attorneys' fees and costs.

6. Affiant is not currently suffering any infirmities and is competent to testify to all the foregoing.

FURTHER AFFIANT SAYETH NOT.

  
Richard J. Wolf

SUBSCRIBED AND SWORN to  
before me this 6<sup>th</sup> day  
of February           , 2017.

  
Notary Public



CHICAGO PAINTERS & DECORATORS  
EMPLOYER ID/IC BILLING STATUS REPORT  
FOR OPEN CHARGES ONLY

DATE: 12/27/2016  
PAGE: 2

EMPLOYER NAME	EMPLOYER NUMBER	CONT. MTH	ORIGINAL RECEIPT	RECEIPT DATE	CONTRIBUTION AMOUNT	CHARGES DUE	RCPT TYPE	RECEIPT NUMBER	RATE TABLE	RPT STATUS	NBR
REGENCY DEC SERVICE	27608	1/2014	305195	1/13/2015	\$1,027.55	\$102.76	LD	64431	1	0	3
REGENCY DEC SERVICE	27608	3/2014	305196	1/13/2015	\$627.55	\$94.13	LD	64432	1	0	3
REGENCY DEC SERVICE	27608	5/2014	300381	9/23/2014	\$24,657.28	\$2,364.76	LD	58581	1	0	1
REGENCY DEC SERVICE	27608	6/2014	301234	10/15/2014	\$20,816.28	\$2,293.90	LD	58971	1	0	1
REGENCY DEC SERVICE	27608	7/2014	304704	12/26/2014	\$26,813.82	\$2,681.38	LD	59646	1	0	1
REGENCY DEC SERVICE	27608	8/2014	304705	12/26/2014	\$11,103.48	\$1,665.52	LD	59647	1	0	1
REGENCY DEC SERVICE	27608	9/2014	307419	3/06/2015	\$17,268.08	\$2,590.22	LD	64433	1	0	1
REGENCY DEC SERVICE	27608	10/2014	307524	3/09/2015	\$30,883.36	\$4,632.52	LD	59980	1	0	1
REGENCY DEC SERVICE	27608	11/2014	309123	4/17/2015	\$11,118.69	\$1,667.82	LD	64434	1	0	1
REGENCY DEC SERVICE	27608	12/2014	309443	4/23/2015	\$10,142.72	\$1,521.41	LD	64435	1	0	1
REGENCY DEC SERVICE	27608	1/2015	311154	6/02/2015	\$16,018.61	\$1,601.88	LD	64436	1	0	1
REGENCY DEC SERVICE	27608	2/2015	312428	7/05/2015	\$13,864.20	\$2,079.63	LD	60545	1	0	1
REGENCY DEC SERVICE	27608	3/2015	312709	7/15/2015	\$14,731.51	\$2,209.73	LD	64437	1	0	1
REGENCY DEC SERVICE	27608	4/2015	316669	10/21/2015	\$15,334.10	\$2,300.12	LD	64438	1	0	1
REGENCY DEC SERVICE	27608	5/2015	316670	10/21/2015	\$16,432.91	\$2,464.95	LD	64439	1	0	1
REGENCY DEC SERVICE	27608	6/2015	318993	12/18/2015	\$21,339.62	\$3,200.96	LD	61767	1	0	1
REGENCY DEC SERVICE	27608	7/2015	319109	12/24/2015	\$33,107.83	\$4,966.17	LD	61768	1	0	1
REGENCY DEC SERVICE	27608	8/2015	323157	4/01/2016	\$12,853.11	\$1,927.96	LD	64441	1	0	1
REGENCY DEC SERVICE	27608	9/2015	321732	3/02/2016	\$8,623.49	\$1,293.52	LD	62297	1	0	1
REGENCY DEC SERVICE	27608	10/2015	322233	3/17/2016	\$8,518.71	\$1,277.80	LD	64440	1	0	1
REGENCY DEC SERVICE	27608	11/2015	325977	6/24/2016	\$7,771.88	\$1,165.78	LD	64442	1	0	1
REGENCY DEC SERVICE	27608	12/2015	328357	8/30/2016	\$10,025.42	\$1,503.82	LD	64443	1	0	1
REGENCY DEC SERVICE	27608	1/2016	328358	8/30/2016	\$11,069.83	\$1,106.99	LD	64444	1	0	1
REGENCY DEC SERVICE	27608	2/2016	328829	9/16/2016	\$10,861.36	\$1,629.22	LD	64445	1	0	1
REGENCY DEC SERVICE	27608	3/2016	329524	10/11/2016	\$8,614.88	\$1,292.23	LD	63510	1	0	1
REGENCY DEC SERVICE	27608	3/2016	329563	10/12/2016	\$5,315.35	\$797.32	LD	63522	1	0	3

GRAND TOTALS

\$918,110.97 \$109,032.51

EXHIBIT I