

# Exhibit A

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

PNC BANK, NATIONAL ASSOCIATION,	)	
successor to National City Bank,	)	
	)	Case No.
Plaintiff,	)	
	)	Judge:
v.	)	
	)	
THOMAS F. WILLSON,	)	Magistrate:
	)	
Defendant.	)	

**AFFIDAVIT**

I, Frank Kiernan, being first duly sworn, depose and upon my oath state that if called to testify in these proceedings, I would testify as follows:

1. I am a Vice President and Senior Asset Manager of the Asset Resolution Team of PNC Bank, National Association, successor in interest to National City Bank (“PNC”); I am a duly authorized representative of PNC, the plaintiff in the above-captioned cause; and I am duly authorized to make this affidavit on behalf of PNC.

2. Pursuant to my duties as an officer of PNC, I have personal knowledge of the matters related to the loan transaction between PNC and the defendant, Thomas F. Willson (“Willson”), and the documents maintained in the ordinary course of business of PNC relative to the transaction as further set forth in this Affidavit. I have reviewed the allegations of the Complaint filed on behalf of PNC in the above-captioned cause, and they are true.

3. PNC Bank is a national banking association organized under the laws of the State of Delaware, and its main office is located in the Commonwealth of Pennsylvania. On November 6, 2009, the United States Office of the Comptroller of Currency certified the merger of National City Bank and PNC Bank. A true and correct copy of the Certificate detailing the bank succession is attached to the Complaint as Exhibit A and is incorporated herein by reference.

4. True and correct copies of the Promissory Note dated March 2, 2007, in the original principal amount of \$262,000.00, and its amendment dated December 16, 2011, each executed by Willson, individually, in favor of PNC (as amended, the "Note"), are attached to the Complaint as Exhibits B and C, respectively, and are incorporated herein by reference.

5. Willson is and has been in default under the terms and conditions of the Note as a result of its failure to make payments required by the Note in a timely manner.

6. As a result of the aforesaid defaults by Willson of his obligations to PNC under the Note, as of February 2, 2017, the following is due and owing to PNC from Willson:

Principal:	\$	183,687.21
Interest:	\$	2,852.23
Late Charge:	\$	<u>14,526.46</u>
<b>TOTAL:</b>	<b>\$</b>	<b>201,065.90</b>

7. A true and correct copy of PNC's payoff (the "Payoff") for the Note, prepared in the regular course of business of PNC, is attached hereto and made a part hereof as Exhibit 1.

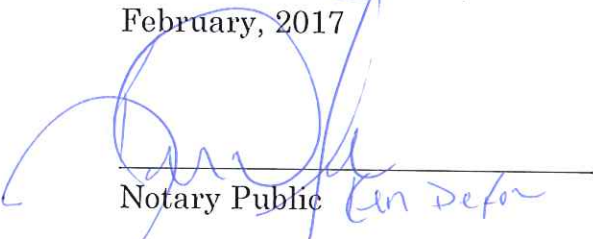
8. In addition to the foregoing, Willson agreed to reimburse PNC for attorney's fees and related costs incurred by PNC in enforcing its rights arising out of the Note. As of the filing of this Affidavit, PNC has incurred attorney's fees in connection with this matter in the amount of \$2,500.00.

9. The matters set forth in this affidavit are true in substance and in fact and are based upon my own personal knowledge thereof and upon my review and reliance upon of the relevant business records of PNC, which are attached hereto and to the Complaint as exhibits. If called as a witness I could and would testify competently thereto.

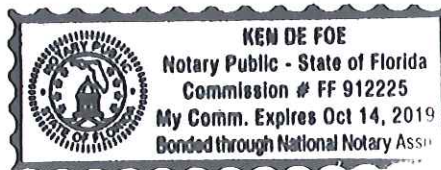


Frank Kiernan,  
duly authorized representative of the plaintiff,  
PNC Bank, National Association,  
successor to National City Bank

Subscribed and Sworn to  
before me this 3 day of  
February, 2017



Notary Public



# Exhibit

1

# Nicholas Maragos

**From:** Kiernan, Frank E <frank.kiernan@pnc.com>  
**Sent:** Thursday, February 02, 2017 12:10 PM  
**To:** Nicholas Maragos  
**Subject:** RE: Thomas F. Willson

At 7.65% / Per Diem of \$39.03

## Loan - Payoff

### Obligor Overview

#### Basic Information

<b>Customer ID:</b>		<b>Customer Tax ID</b>	
<b>Customer Name</b>	THOMAS F WILLSON	<b>Alternate ID</b>	
		<b>Customer Power ID</b>	0004600892
		<b>Primary Officer</b>	KIERNAN, FR
<b>Sort Name</b>	WILLSON THOMAS F	<b>NAICS Cd-Desc</b>	561499 - AL

### Loan Information

#### Basic Info

Portfolio	01	Customer Balance	183,6
Loan Number	605288872	Current G/L Balance	163,9
Loan Status	1-OPEN/ACTIVE	Note Amount	262,0
Rate Type	FIX	Note Date	03/02
Sec/Sub Lmt		Product Type-Desc	084-C
Template		Purpose Code-Desc	BLANK
LGD Rating	F	FRB Code-Desc	93-NC
Primary Officer	KIERNAN, FRANK E	Effective Date	12/16
Maturity Date	11/21/2016	Currency-Desc	USD-
Acquisition ID	PNC00		

### Loan Payoff Selection Section

#### Borrower/Investor

WILLSON THOMAS F 600-DIRECT CRDT/ACT

Select	Balance Category	Category Name
<input checked="" type="checkbox"/>	INT	INTEREST OWING
<input checked="" type="checkbox"/>	LTCHG	LATE CHARGE

#### Accrue To Date:



02/02/2017

[Go](#)

#### Loan Payoff Information

Principal Balance	183,687.21
INTEREST OWING	2,852.23
LATE CHARGE	14,526.46
<b>Payoff Amount</b>	<b>201,065.90</b>

## Frank Kiernan

V.P. Sr. Asset Manager

## PNC Bank National Association

201 E Pine St. (Suite 100) (Mail Stop A1-P812-01-2)

Orlando FL 32801

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