

EXHIBIT A

AFFIDAVIT OF BRUCE MCCAULEY

STATE OF MICHIGAN)
) ss.
COUNTY OF GRAND TRAVERSE)

Bruce McCauley, being sworn, states as follows:

1. I reside in Grand Traverse County, Michigan.
2. From August of 2011 to January 8, 2018, I was a Project Manager for National Coatings, Incorporated (the “Company”) in the Traverse City region.
3. As a Project Manager, I had first-hand knowledge, and helped implement, the Company’s wage and payment practices.
4. During my time as the Project Manager, it was the Company’s unwritten policy to not pay employees for drive or travel time, even though this work was done necessarily and primarily for the Company’s business.
5. This policy was directed to me by the Company’s President, Bob Forsman.
6. As a result, employees were not allowed to sign in for the day until they arrived at the remote work sites, and were forced to sign out once they left the construction sites.
7. Per the Company’s directions, if employees did write down the travel and drive time done for the Company, I would go and change the paystubs to take time away that employees had legitimately claimed.



8. Often, these drives for employees would range between 45 minutes and 1.5 hours per day, each way, or about 1.5 to 3 hours per day that employees were working for the Company but not being compensated.

9. To clarify, employee travel time generally occurred with employees arriving at the work office in the morning in Traverse City, Michigan, loading Company gear in a Company truck, and then driving to the job site where that gear would be used by those same employees.

10. The employees would then drive back at the end of the day with the company truck to the office.

11. The hourly paid employees were not compensated for this travel time, and this travel time was not included in their pay stubs or checks.

12. While in the Company truck driving to and from job sites, employees were subject to company rules, covered by Company insurance, and were transporting company gear and tools that were to be used for Company jobs.

13. This travel time, which was required as a part of the employment, was intentionally not compensated, or factored, for hourly wages or overtime.

14. If employees tried to claim the travel time, I myself, or others at the Company, would routinely erase that time from the employee time sheets.

15. I did this per the directions of the Company because I was told to do so and I did not want to jeopardize my own job by trying to raise concerns I had about this practice.

I declare under penalty of perjury that the foregoing is both true and correct.



Bruce McCauley

On this 2 day of February, 2018, before me, a Notary Public, personally appeared Bruce McCauley, to me known to be the same person described in and who executed the within instrument, and who acknowledged the same to be his free act and deed.

Kathleen A. Harrigan
Kathleen A. Harrigan, Notary Public
Grand Traverse County, Michigan
Acting in Grand Traverse County, Michigan
My Commission Expires: 03/11/2019