

**Sample Complaint Trust Fund Diversion Lien Law Article 3-A**

SUPREME COURT OF NEW YORK  
COUNTY OF

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Electrical Supply Company Inc.

Plaintiff

v. VERIFIED COMPLAINT

Index No.

Electric Contractor Inc., Mr. Tom President  
And Mr. John Treasurer

Defendants

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Plaintiff, by their attorneys, Alvy & Tablante, LLP, as and for their Verified Complaint against Defendants, upon information and belief, allege:

AS AND FOR A FIRST CAUSE OF ACTION

1. Plaintiff, Electrical Supply Company Inc. (hereinafter "ESCI") is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York with its principal office at 1 Main Street.
2. Upon information and belief, Defendant, Electric Contractor Inc., (hereinafter "Contractor"), is a domestic corporation organized and existing under and by virtue of the laws of the State of New York with its principal office at 1 Detroit Street.
3. Upon information and belief Defendant, Tom President, is an officer, director or agent of Contractor.
4. Upon information and belief Defendant, John Treasurer, is an officer, director or agent of Contractor.
5. Upon information and belief, Defendant, Contractor, as sub-contractor, entered into a subcontract with Pinnacle Construction, as general contractor or construction manager, wherein for consideration to be paid to Contractor, Contractor agreed to furnish labor and materials at a project known as The House located at Broad Street, New York, New York (hereinafter "The House Project").