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

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)
)
Plaintiffs,)
, and the second) No. 09 C 323
V.)
) Judge Coar
KJR CARTAGE, INC.,)
an Illinois corporation,) Magistrate Judge Brown
,)
Defendant.)

AFFIDAVIT

RICHARD SIEBERT, upon being first duly sworn deposes and states as follows:

- 1. Affiant is employed by the Suburban Teamsters Welfare and Pension Fund ("Funds") as an auditor, is familiar with the KJR Cartage, Inc. audit ("Employer"), having examined its books and records to determine what amounts if any were due and owing the Funds, and is also familiar with the parties' agreement concerning contributions, liquidated damages and interest owed.
- 2. That an audit of Employer's books and records was performed on April 21, 2009 covering the period August, 2008 through March, 2009 and found to be owing:

Pension \$2,265.32 Welfare \$2,337.53

- 3. That Employer was given a copy of the audit and given notice of findings and has made no effort to pay.
 - 4. That the audit including liquidated damages and interest totals \$4,602.85.
 - 5. That Affiant suffers from no disability and can so testify and affirm such facts.

FURTHER AFFIANT SAYETH NOT.

SUBSCRIBED AND SWORN to before me this day of June, 2009.

OFFICIAL SEAL

CAROL COLLINS

CAROL COLLINS

Notary Public - State of Illinois

My Commission Expires Jul 20, 2011

Notary Public