

EXHIBIT B

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


TRUSTEES OF THE AUTOMOBILE)	
MECHANICS' INDUSTRY WELFARE AND)	
PENSION FUNDS OF THE INTERNATIONAL)	
ASSOCIATION OF MECHANICS AND)	
AEROSPACE WORKERS AFL-CIO, LOCAL)	
701,)	
)	
Plaintiff,)	09 CV 4816
v.)	Hon. Charles R. Norgle
)	
PETE SAVIANO'S AUTOMOBILE REPAIR,)	
INC.,)	
)	
Defendant.)	

DECLARATION OF PAUL NEUMANN

1. My name is Paul Neumann.
2. I am the Controller of the Automobile Mechanics' Local 701 Industry Pension and Welfare Funds.
3. It is my responsibility to keep track of the amounts of money owed by union employers in fringe benefit contributions under their contracts.
4. I am familiar with the defendant in this matter, Pete Saviano's Automobile Repair Inc.
5. I am familiar that they are a signed employer to a union collective bargaining agreements that obligate them to make fringe benefit contributions to the union pension and welfare funds.

6. .As part of my responsibility we keep true and accurate copies of the signed collective bargaining agreements signed the employers to the agreements in our offices.
7. True and accurate copies of the agreements obligating Saviano to make fringe benefit contributions to the plaintiff funds have been attached to the complaint in this case.
8. These documents were kept in the usual and ordinary course of business and not for purpose of litigation.
9. Attached hereto as Exh. 1, is a statement of what Saviano owes in fringe benefits to the plaintiff welfare and pension funds to the best of my knowledge and ability.
10. The amount shown is \$6,785,50 owed to the Welfare Fund since June of 2008 and \$2,799.50 owed to the Pension Fund.

I declare the above to be true under penalty of perjury to the best of my knowledge and ability.



Paul Neumann

Date: August 27, 2009

Pete Savaiano's Auto Repair		#29227									
4539 W 91st St		Updated: 4/20/09									
Oak Lawn, IL 60453		Owner/Member: Pete Savaiano									
(708) 499-5015		B.A.: R. Lessmann									
Contribution Month	Due Date	Penalty Date	Welfare Contribution	Welfare Total	Penalty	Pension Contribution	Pension Total	Penalty	Pension Total	Comments	
Jun-08 penalty	7/18/2008			86.00	86.00		35.00	35.00			
Jul-08 penalty	8/18/2008			86.00	172.00		70.00	35.00			
Aug-08 penalty	9/17/2008			107.00	279.00		114.00	44.00			
Sep-08 estimate	10/10/2008	0.00		279.00	279.00	445.00	559.00			Sept 08 Pension check NSF	
Oct-08 estimate	11/10/2008	860.00	860.00	1,139.00	86.00	356.00	915.00				
Oct-08 penalty	11/18/2008			1,225.00		445.00	950.00	35.00			
Nov-08 estimate	12/10/2008	1,075.00	1,075.00	2,300.00		445.00	1,395.00				
Nov-08 penalty	12/17/2008			2,407.50	107.50	356.00	1,439.50	44.50			
Dec-08 estimate	1/10/2009	860.00	860.00	3,267.50		495.00	1,795.50				
Dec-08 penalty	1/20/2009			3,353.50	86.00	495.00	1,830.50	35.00			
Jan-09 estimate	2/10/2009	1,200.00	1,200.00	4,553.50		396.00	2,325.50				
Jan-09 penalty	2/18/2009			4,673.50	120.00	396.00	2,374.50	49.00			
Feb-09 estimate	3/10/2009	960.00	960.00	5,633.50		-445.00	2,770.50				
Feb-09 penalty	3/18/2009			5,729.50	96.00	445.00	2,809.50	39.00			
Sep-08 pmt	3/20/2009	0.00	0.00	5,729.50		396.00	3,205.50			ck#11379 (replacement ck)	
Sep-08 NSF	3/26/2009	0.00	0.00	5,729.50		-445.00	2,809.50			ck#11379 NSF	
Mar-09 estimate	4/10/2009	960.00	960.00	6,689.50		-445.00	3,244.50				
Mar-09 penalty	4/20/2009			6,785.50	96.00	-445.00	2,799.50	39.00			
Sep-08 replacme	4/20/2009			6,785.50			2,799.50			ck#11430 (replacement ck)	
TOTAL			5,915.00	6,785.50	870.50	2,444.00	2,799.50	355.50			

