

EXHIBIT A

3. In the regular course of business, the Pension Fund keeps and maintains files relating to the contributions owed by Defendant to the Pension Fund. The file is under my dominion and control.

4. On the date this action was filed and to the present date, Plaintiff Howard McDougall was and is one of the trustees and a fiduciary of the Pension Fund. The Trustees are the plan sponsors of the Fund within the meaning of Section 4001(a)(10) of ERISA, 29 U.S.C. § 1301(a)(10).

5. The Pension Fund is a multiemployer plan which is administered at its principal place of business at 9377 West Higgins Road, Rosemont, Illinois 60018-4938.

6. The Pension Fund receives employer contributions from employers pursuant to collective bargaining agreements by and between employers and various local unions affiliated with the International Brotherhood of Teamsters ("IBT"). All principal and income from such contributions and investments thereof is held and used for the exclusive purpose of providing benefits to participants and beneficiaries of the Pension Fund and paying the administrative expenses of the Fund.

7. The Pension Fund's records indicate that Defendant was bound by a collective bargaining agreement entered into with Local Union No. 364 of the IBT ("Local 364") under which Defendant was required to pay employer contributions to the Pension Fund on behalf of certain of its employees.

8. Defendant also entered into a Participation Agreement with Local Union No. 364 of the IBT that requires Defendant to pay contributions to the Pension Fund.

9. Defendant is bound by the Pension Fund's Trust Agreement.

10. The Pension Fund relies upon employers to self-report the work history of eligible employees. The Pension Fund relies upon these reports submitted by employers to prepare a monthly contributions bill that is sent to the employers.

11. IT Equipment self-reported the work history of its employees to the Pension Fund for the period May 2009 through October 2009.

12. Since Plaintiffs filed their complaint in this case, IT Equipment has paid the contributions and interest owed for the period May 2009 through July 2009.

13. However, IT Equipment has not paid all employer contributions owed by to the Pension Fund for the period of August 2009 through October 2009 based upon the employee work history reported by the Defendant in the principal amount of \$10,171.79. A true and genuine copy of the Pension Fund's Breakdown of Contributions Outstanding for Defendant is attached hereto as Exhibit 1 and is incorporated herein by reference.

14. The Pension Fund is entitled to the following relief when prevailing in an action under Section 515 of ERISA, 29 U.S.C. § 1145:

- (i) the unpaid contributions;
- (ii) interest on the unpaid contributions;
- (iii) an amount equal to the greater of the interest or liquidated damages as provided under the Plan in an amount not in excess of twenty percent (20%) of the unpaid contributions; and
- (iv) reasonable attorney's fees and costs.

15. Pursuant to the terms of the Pension Fund's Trust Agreement, the Pension Fund is entitled to pre-judgment interest on the entire outstanding balance at an annualized interest rate equal to two percent (2%) plus the prime interest rate established by JPMorgan Chase Bank, NA for the fifteenth (15th) day of the month for which interest is charged and shall be compounded annually.

16. Through November 30, 2009, Defendant owes interest on the unpaid employer contributions in the total amount of \$58.66 to the Pension Fund.

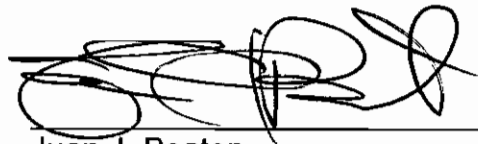
17. Pursuant to the terms of the Pension Fund's Trust Agreement, the Pension Fund is entitled to the greater of doubled interest or liquidated damages in the amount of twenty percent (20%) of unpaid employer contributions.

18. Defendant owes liquidated damages in the greater amount of twenty percent (20%) of the unpaid employer contributions in the total amount of \$2,034.36 to the Pension Fund.

19. As a result of Defendant's failure to pay all of the contributions owed by Defendant to the Pension Fund, Defendant is indebted in the total amount of \$12,264.81 to the Pension Fund, exclusive of attorney's fees and costs.

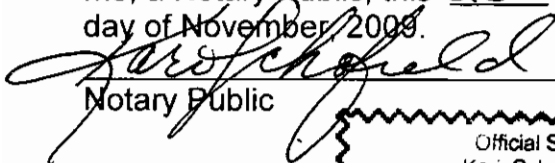
20. Under the Pension Fund's Plan, interest on a judgment entered against an employer is computed and charged at an annualized interest rate equal to two percent (2%) plus the prime interest rate established by JPMorgan Chase Bank, NA for the fifteenth day of the months for which the interest is charged.

FURTHER AFFIANT SAYETH NOT.



Juan J. Beaton

Subscribed and sworn to before
me, a Notary Public, this 25th
day of November 2009.



Notary Public

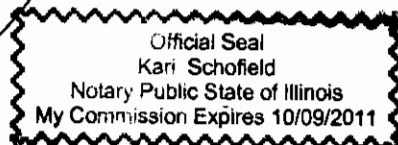


EXHIBIT 1

CENTRAL STATES, SOUTHEAST AND SOUTHWEST AREAS
PENSION FUND

SUMMARY OF CONTRIBUTIONS OUTSTANDING
AS OF NOVEMBER 24, 2009

INDUSTRIAL TRANSMISSION
ACCOUNT NO. 3996600-0108

TRANS. NO	DESCRIPTION	AMOUNT	INT. THRU 11/30/09*	PAYMENTS APPLIED	DATE POSTED	BALANCE DUE
2004206	08/2009 Billing	4,488.00	36.56	1,394.61 1,000.00	11/2/2009 11/6/2009	2,129.95
2023350	09/2009 Billing	3,590.40	15.60	-		3,606.00
2042289	10/2009 Billing	4,488.00	6.50	-		4,494.50
TOTALS		<u>\$12,566.40</u>	<u>\$58.66</u>	<u>\$2,394.61</u>		<u>\$10,230.45</u> **

FOOTNOTES:

*Interest thru 11/30/09
computed on individual items
from date due.

** A judgment entered against an employer shall include the total balance due as stated
above plus an additional amount equal to the greater of:

(A) Doubling of interest \$58.66

(B) Liquidated damages, based on the unpaid
contributions in the amount of 20% \$2,034.36

MEMBER CONTRIBUTION REPORT

MEMBER INFORMATION

Report Date 11/24/2009

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Employer : INDUSTRIAL TRANS EQUIPMENT IN
 Period Start : 08/01/2009 - Period Stop : 10/31/2009
 Sorted by : Terminal - Member Name

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC					
APPLEWHITE, RICHARD																	
					Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/29	04/26	05/31	06/28	07/26	LOU	08/30	LOU	09/27	LOU	11/01	11/29			
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02	LOU	09/06	LOU	10/04	LOU	11/08	12/06			
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09	LOU	09/13	LOU	10/11	LOU	11/15	12/13			
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16	LOU	09/20	LOU	10/18	LOU	11/22	12/20			
01/25				05/24			08/23	LOU			10/25	LOU					
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00			
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00			
Year: 2009	H&W \$0.00				PEN \$0.00												
BEATTY, TERRY																	
					Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/29	04/26	05/31	06/28	07/26	ACT	1	08/30	ACT	1	09/27	ACT	1	11/01	11/29
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02	ACT	1	09/06	ACT	1	10/04	ACT	1	11/08	12/06
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09	ACT	1	09/13	ACT	1	10/11	ACT	1	11/15	12/13
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16	ACT	1	09/20	ACT	1	10/18	ACT	1	11/22	12/20
01/25				05/24			08/23	ACT	1			10/25	ACT	1			
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	5	\$0.00	4	\$0.00	5	\$0.00	\$0.00	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$408.00		\$326.40		\$408.00		\$0.00	\$0.00	\$0.00	\$0.00
Year: 2009	H&W \$0.00				PEN		Weeks: 14 \$1142.40										
CHIZUM, MATTHEW																	
			SSN: [REDACTED]		Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/29	04/26	05/31	06/28	07/26	LOU	08/30	LOU	09/27	LOU	11/01	11/29			
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02	LOU	09/06	LOU	10/04	LOU	11/08	12/06			
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09	LOU	09/13	LOU	10/11	LOU	11/15	12/13			
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16	LOU	09/20	LOU	10/18	LOU	11/22	12/20			
01/25				05/24			08/23	LOU			10/25	LOU					
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Year: 2009	H&W \$0.00				PEN		\$0.00										
CORNETT, GARTH																	
			SSN: [REDACTED]		Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/29	04/26	05/31	06/28	07/26	ACT	1	08/30	ACT	1	09/27	ACT	1	11/01	11/29
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02	ACT	1	09/06	ACT	1	10/04	ACT	1	11/08	12/06
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09	ACT	1	09/13	ACT	1	10/11	ACT	1	11/15	12/13
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16	ACT	1	09/20	ACT	1	10/18	ACT	1	11/22	12/20
01/25				05/24			08/23	ACT	1			10/25	ACT	1			
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	5	\$0.00	4	\$0.00	5	\$0.00	\$0.00	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$408.00		\$326.40		\$408.00		\$0.00	\$0.00	\$0.00	\$0.00
Year: 2009	H&W \$0.00				PEN		Weeks: 14 \$1142.40										
DOODY, ARTHUR																	
			SSN: [REDACTED]		Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/29	04/26	05/31	06/28	07/26	LOU	08/30	LOU	09/27	LOU	11/01	11/29			
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02	LOU	09/06	LOU	10/04	LOU	11/08	12/06			
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09	LOU	09/13	LOU	10/11	LOU	11/15	12/13			
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16	LOU	09/20	LOU	10/18	LOU	11/22	12/20			
01/25				05/24			08/23	LOU			10/25	LOU					
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Year: 2009	H&W \$0.00				PEN		\$0.00										

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Sorted by : Terminal - Member Name

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC			
RONEY, TIM, J															
	SSN: [REDACTED]		Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/28	04/28	05/31	06/28	07/26 ACT	1	08/30 ACT	1	09/27 ACT	1	11/01	11/29	
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02 ACT	1	09/06 ACT	1	10/04 ACT	1	11/08	12/06	
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09 ACT	1	09/13 ACT	1	10/11 ACT	1	11/15	12/13	
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16 ACT	1	09/20 ACT	1	10/18 ACT	1	11/22	12/20	
01/25				05/24			08/23 ACT	1			10/25 ACT	1			
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	5	\$0.00	4	\$0.00	5	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$408.00		\$328.40		\$408.00		\$0.00	\$0.00
Year: 2009 H&W \$0.00															
PEN Weeks: 14 \$1142.40															
SNEAD, JEREMIAH, D															
	SSN: [REDACTED]		Year: 2009		ETLC No. 3996600 - 0108 - 00364A		Employee Type : Regular								
12/28	02/01	03/01	03/28	04/28	05/31	06/28	07/26 ACT	1	08/30 ACT	1	09/27 ACT	1	11/01	11/29	
01/04	02/08	03/08	04/05	05/03	06/07	07/05	08/02 ACT	1	09/06 ACT	1	10/04 ACT	1	11/08	12/06	
01/11	02/15	03/15	04/12	05/10	06/14	07/12	08/09 ACT	1	09/13 ACT	1	10/11 ACT	1	11/15	12/13	
01/18	02/22	03/22	04/19	05/17	06/21	07/19	08/16 ACT	1	09/20 ACT	1	10/18 ACT	1	11/22	12/20	
01/25				05/24			08/23 ACT	1			10/25 ACT	1			
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	5	\$0.00	4	\$0.00	5	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$408.00		\$328.40		\$408.00		\$0.00	\$0.00
Year: 2009 H&W \$0.00															
PEN Weeks: 14 \$1142.40															
Report totals:															
H&W	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4488.00		\$3590.40		\$4488.00		\$0.00	\$0.00