

## **EXHIBIT A**



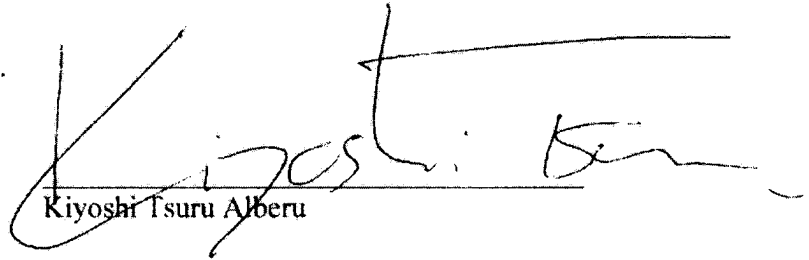
- a. Withholding of business information from CICSAs president, Takashi Tsuru;
  - b. Instructing other CICSAs employees to withhold business information from CICSAs president, Takashi Tsuru;
  - c. Influencing CICSAs management to reduce capital representation of stock of other family members, thereby increasing their collective percentage of CICSAs ownership;
  - d. Attempting to purchase stock from other CICSAs shareholders, which would have resulted in their holding a majority of CICSAs shares;
  - e. Minimizing and neutralizing the participation of, and access to CICSAs operations to Shizuko Tsuru, who had served as Operations Manager for decades, and eventually causing her separation as a CICSAs employee.
9. Defendants Masao Tsuru Santa Rosa, and Yasuo Tsuru Santa Rosas management of CICSAs was not favorable to CICSAs, causing significant damage and in about March of 2007 Defendants Masaru Tsuru Kayaba, Masao Tsuru Santa Rosa, and Yasuo Tsuru Santa Rosa were no longer involved in employment or management activities of CICSAs.
  10. In and about July of 2007, Defendants Masao Tsuru Santa Rosa and Yasuo Tsuru Santa Rosa entered CICSAs premises with a group of armed security guards, around midnight. I instructed our security to refuse entrance to them, and I contacted the Mexican police. However, Defendants Masao Tsuru Santa Rosa and Yasuo Tsuru Santa Rosa dismantled CICSAs servers containing confidential business information and obtained them through the use of armed force.
  11. In and around July of 2007, I was involved in a dispute over domain names reflecting principal or main trademarks of CICSAs. While doing due diligence for CICSAs, it was discovered that certain domain names, reflecting the principal trademarks of CICSAs, were not controlled by CICSAs, but by Yasuo Tsuru Santa Rosa, in his capacity as administrative contact thereof, through a service provider company called Web Hosting Mexico Virtual, S.A. de C.V. ("México Virtual").
  12. The domain names owned by CICSAs at issue are as follows:
    - a. vitacilina.org
    - b. vitacilina.net
    - c. vitacilina.biz
    - d. vitacilina.com
    - e. derman.org

- f. rocinol.com
  - g. vitacilinababy.com
  - h. vitacilina-baby.com
  - i. vitacilinabebe.com
  - j. vitacilina-bebe.com
  - k. ksk.com.mx
  - l. vitacilina.com.mx
  - m. vitacilinabebe.com.mx
  - n. vitacilina-bebe.com.mx
  - o. vitacilina-baby.com.mx
  - p. rocinol.com.mx
13. Mexico Virtual is owned by a friend of Yasuo Tsuru Santa Rosa, Mr. Kanahwati. I asked Yasuo Tsuru Santa Rosa and Mexico Virtual to return the names by changing the administrative contact information on several occasions, but Yasuo Tsuru Santa Rosa refused to return the names to CICSA” and in fact, transferred the administrative contact information to a third party.
14. Mexico Virtual has refused to release the domain names unless an outstanding balance is paid, although the balance owed is for a period of time that CICSA was not using the names.
15. “CICSA filed 10-14 procedures with the local Dot Mx registry to secure the return of the names. Dot mx issued a decision that the domain names were purchased by CICSA and that CICSA retained ownership. A true and correct copy of this decision is attached to this sworn statement as **Exhibit “A-2.”**
16. CICSA is still unable to use its domain names because Mexico Virtual has refused to transfer the DNS servers.
17. Defendants Masaru Tsuru Kayaba, Masao Tsuru Santa Rosa, and Yasuo Tsuru Santa Rosa have wrongfully retained possession of property belonging to CICSA. Such property includes three cars: (a) a jaguar 2006; (b) a Peugeot 607 2003; and (c) a 5RX Cadillac SUV 2004. Such property also includes equipment such as plasma screen televisions, PDAs and other office items contained in CICSA’s premises. Attached to this sworn statement as **Exhibit “A-3”** is a description of vehicles rightfully owned by CICSA and being retained by Defendants Masaru Tsuru Kayaba, Masao Tsuru Santa Rosa, and Yasuo Tsuru Santa Rosa.

18. Defendant Masaru Tsuru Kayaba was caught leaving CICSA's premises with software licenses belonging to CICSA hidden in a newspaper under his arm.
19. Exhibits A-1 through A-3 are true and correct copies of the documents identified above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 31th day of March 2009.

  
Kiyoshi Tsuru Alberu