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April 8, 2008

Andrew L. Stern, President
 Service Employees International Union
 1800 Massachusetts Ave., N.W.
 Washington, DC 20036

Re: Your Letters of April 7 Concerning Follow-up to Inquiry and Request for Additional Materials

Dear Brother Stern:

We appreciate your acknowledgment that UHW has been both cooperative and timely in responding to your March 24 "inquiries" and request for documents, as well as your recognition that the "allegations" contained therein were "much about nothing." And we have every expectation that you will be equally satisfied with the responses you will be receiving pursuant to the above "follow-up" request.

However, as a practical matter, there is no way that your extensive and exhaustive demand for the production of documents and other information can possibly be met by April 10, *i.e.*, in just three days. It is obvious that it was framed by experienced legal counsel who must realize that we would be entitled to thirty days, rather than just three, in which to respond in a formal judicial setting. Moreover, the vast majority of the documents you are demanding do not belong to, and are not in the possession of, UHW; rather, as you recognize, they are records that belong to the United Healthcare Workers and Patients Education Fund ("Fund") which is a separate and independent § 501(c)(3) legal entity. And your authority under Article XIII § 6(a) of the SEIU Constitution to audit local union financial records does not give you the right to audit, much less require the production of, its records, and to insist on compliance within just three days.

For your information, Joan Emslie is forwarding your letter to the Fund's Board of Directors and it is my understanding that she intends to schedule a meeting on the evening of April 10 to consider your exhaustive request for virtually all of its records. While I am reasonably confident the Board will, in the spirit of cooperation, elect to furnish you with requested information and documents, it will still require additional time in which to assemble those extensive materials and transmit them to you. I am hopeful that, assuming that the Fund's Board is agreeable, this process can be completed by April 16, 2008. As a demonstration of good faith, by this letter we are enclosing those documents which are readily accessible, specifically the minutes from the UHW executive board as requested.

www.seiu-uhw.org

Sal Rossetti, President

Jorge Rodriguez, Executive Vice President

Joan Emslie, Secretary-Treasurer

To reiterate, I have every expectation that, once you have reviewed these materials, you will be satisfied that all is on "the up and up." UHW will continue to be as cooperative and timely as possible with respect to your latest "request."

As the fastest growing local union in SEIU, we are proud of our work in UHW to make SEIU a bigger and better union. We look forward to our continued debate about the future of SEIU and the labor movement and in that spirit we ask that you forward this response to those who received your April 7 letters, including those at the SEIUUNITY. gmail address.

In Unity,

A handwritten signature in black ink, appearing to read "Sal Rosselli".

Sal Rosselli
President

SR/dn:seiu-uhw/ctw