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Attorneys for International President Andrew L. Stern

In Re Hearing on Whether a Trustee Should)	International Union President
Appointed at SEIU United Healthcare)	UHW-W's Proffer Of Facts and
Under Article VIII, Section 7 of the SEIU)	To Affirmative Defenses
Constitution)	
)	Hearing Officer: Ray Marshall
)	

DECLARATION OF THOMAS DEBRUIN

Thomas DeBruin states under penalty of perjury that the following is true and correct:

1. I have read the Sur-Rebuttal Declaration of Thomas Dewar submitted on November 20, 2008. ("Dewar 11/20/08 Declaration"). As I testified at the hearing on November 15, 2008, see 11/15/08 transcript at 1242-1243, prior to the news story that Mr. Dewar now admits he planted in the alternative weekly publication San Francisco Bay Guardian on April 9, 2008, I had never heard of the terms "skunk team" or "skunk works team." UHW-W Exhibit 78; Dewar 11/20/08 Declaration at ¶ 16.

2. Mr. Dewar now claims in his Declaration that I was part of a "skunk team group." According to Dewar, "The skunk team group then brainstormed about which senior staff at

UHW they would convert to their side.” Dewar 11/20/08 Declaration at ¶ 13. His description of that lunch discussion is wholly inconsistent with my clear memory of the event and of the conversations that took place around the table.

3. I personally supervised the work of Josie Mooney in the lead up to the 2008 Convention, as I was in charge of the 2008 convention program. See IP Exhibit 135 (February 29, 2008 Memorandum of Andy Stern appointing Thomas DeBruin to be the 2008 Convention Program Manager).

4. Her work did not include any “opposition” or negative research into UHW-W officers. Had such a research operation looking into the affairs of Sal Rosselli or any of the other officers of UHW-W existed, I would have known about it. There was no such effort.

DECLARATION PURSUANT TO 28 U.S.C. § 1746

I hereby declare under penalty of perjury that the foregoing is true and correct.

Date: 11/24/08


Thomas DeBruin