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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 MARY KAY HENRY

Mary Kay Henry states under penalty of perjury that the following is true and correct:

1. I am an International Executive Vice President of the Service Employees International Union ("SEIU").
2. I currently serve as the chairperson of the SEIU Healthcare Division Leadership Board.
3. I have read the argument put forth on page 95 of UHW-W's brief under the heading, "The International Promoted a Decertification Campaign Against UHW at Good Samaritan Hospital." The entire basis for that argument is an email that I wrote in response to an email from Bill Ragen.
4. In its brief, UHW-W selectively quoted my response in a way that completely

changes the meaning of my email.

5. International staff employee Bill Ragen asked me on April 24, 2008 whether I thought it would be a good idea to offer another International staff employee, Keisha Stewart, “to help on the Good Sam decert.” Keisha Stewart had recently left her position as a staff person at UHW-W in protest over UHW-W’s public attack on the International Union.

6. At the then-recent facilitated discussion, in which I participated, UHW-W had complained about some of Ms. Stewart’s activities in California after she left UHW-W. My response to Bill Ragen says: “Why do? Need to talk by phone she was issue in facilitated discussion.” In its brief, UHW-W quotes only the first part of my email where I stated “Why do?”

7. Contrary to what UHW-W implies, I was in no way suggesting in my email that it was a poor idea to help UHW-W to fight a decert campaign, let alone was I “promoting” the decertification campaign. It is absurd to suggest that I would ever promote a decert campaign after dedicating my lifework to organizing nurses into the union. I am intimately familiar with the anti-union position of Good Sam and would never do anything to harm the workers’ position.

8. In contrast to what UHW-W states in its brief, the intention of the statements in my email was to raise a question about whether, given UHW-W’s recent complaints about Ms. Stewart, it was a good idea to assign her to help UHW-W fight the decert. In other words, I was trying to accommodate a concern expressed by UHW-W, not harm UHW-W.

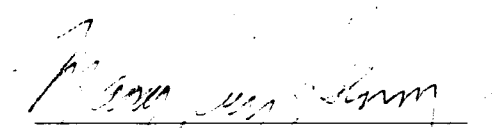
9. I am aware that UHW-W obtained the quoted email either by itself gaining unauthorized access to Steven Lerner’s email account, or by receiving it from someone who gained such access. One of the problems that occurs when an outsider steals just one person’s email messages is that, if the victim of the theft has communicated as part of a group of three or

more correspondents, and is left out of a communication between the others, the thief will not have the benefit of the full context of the relevant exchange of messages. For completeness, I am therefore attaching to this Declaration as International President's Exhibit 145 the message that Bill Ragen sent me concerning Ms. Stewart.

DECLARATION PURSUANT TO 28 USC § 1746

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

Date: 12/18/08



Mary Kay Henry