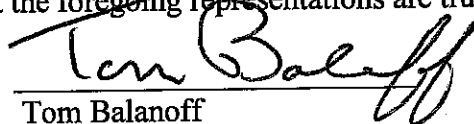


DECLARATION OF TOM BALANOFF

I, Tom Balanoff, declare as follows:

1. I am a Vice President on the International Executive Board of the Service Employees International Union ("SEIU"). I am also President of SEIU Local 1, with 40,000 janitors and security guard members in Chicago, Illinois, and President of the Illinois State Council. As part of my responsibilities, I am familiar with SEIU's activities and membership in Indiana.
2. SEIU is committed to ensuring that every American, including every SEIU member, has the right to vote and the opportunity to exercise that right. SEIU's Mission Statement in the 2008 Constitution and Bylaws states: "We must build political power to ensure that workers' voices are heard at every level of government to create economic opportunity and foster social justice."
3. At our 2008 Convention, SEIU adopted a comprehensive political program that included a commitment set forth in Convention Resolution #201 to "promote civic participation of communities of color and immigrant members and families, including encouraging citizenship and voter registration[.]"
4. SEIU has several Locals in Indiana, and represents 4,738 members across the state. In Lake County, SEIU has 2,604 members; SEIU Local 73 represents public sector workers and SEIU Healthcare Illinois-Indiana members work in the health care industry. The majority of these members live in Gary, Hammond or East Chicago. In each of these three cities, SEIU has African-American, Latino, and Caucasian members.
5. SEIU has many members in Gary, Hammond, and East Chicago who would be benefited by the opportunity to vote early, and intends to educate SEIU members in those cities and elsewhere of early voting opportunities. Many of our members work unpredictable schedules and long shifts and run the risk of not being able to make it to the polls on Election Day. Even members with less changeable schedules, such as public school employees, may run the risk of having to choose between missing work and voting, as long lines and high turnout are expected in the upcoming 2008 general election.
6. SEIU has engaged in significant voter registration activities in Northwest Indiana, including a focus in Lake County. As the general election nears, SEIU intends to educate voters in the county beyond SEIU members – including in Gary, Hammond, and East Chicago – about the election and early voting opportunities. This work will include door to door canvassing and phone-banking efforts to encourage voters to cast their vote early.
7. All working people would be benefited by having expanded opportunities to vote at locations that are easily accessible.

I affirm, under the penalties for perjury, that the foregoing representations are true.


Tom Balanoff

10-2-08
Date