



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
Division of Administration
Washington, DC 20570

April 8, 2009

Gloria Joseph
Director of Administration
(Designated Agency Ethics Official)
National Labor Relations Board
1099 14th Street NW
Washington, DC 20570

Dear Ms. Joseph:

The purpose of this letter is to describe the steps I will take to take to avoid any actual or apparent conflict of interest if I am confirmed as a Board Member of the National Labor Relations Board

As required by 18 USC 208(a), I agree not to participate personally and substantially in any particular matter that would have a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me, unless I first obtain a written waiver pursuant to 18 USC 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 USC 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse, minor children, or any general partner of a partnership in which I am a limited or general partner; any organization in which I am serving as a director, officer, trustee, general partner, or employee; and any person or organization with whom I am negotiating or have an arrangement concerning prospective employment.

Currently, I am the Associate General Counsel for the Service Employees International Union (SEIU) and serve as staff counsel for the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO). Upon confirmation, I will resign from the positions of Associate General Counsel for the SEIU and staff counsel for the AFL-CIO. In addition, pursuant to 5 CFR 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which either the SEIU or the AFL-CIO is a party or represents a party, unless I am first authorized to participate, pursuant to 5 CFR 2635.502(d).

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Furthermore, pursuant to 5 CFR 2635.502, for a period of one year after I last provided services to a former client, I will not participate in any particular matter involving specific parties in which a former client is or represents a party, unless I am first authorized to participate, pursuant to 5 CFR 2635.502(a).

I am vested in the Pension Plan for Employees of the Service Employees International Union. This is a defined benefit plan and, upon eligibility, I will receive monthly retirement benefits. Because I will continue to participate in this entity's defined benefit plan, I will not participate personally and substantially in any particular matter that will have a direct and predictable effect on the ability or willingness of SEIU to provide me with this contractual benefit, unless I first obtain a written waiver under 18 USC 208(b)(1), or qualify for a regulatory exemption under 18 USC 208(b)(2).

Finally, I understand that as an appointee I am required to sign the Ethics Pledge (Executive Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this and any other ethics agreement.

Sincerely,

Harold C. Becker
Associate General Counsel
Service Employees International Union
Staff Counsel
American Federation of Labor and Congress of
Industrial Organizations