

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

THERESA RIFFEY, et al.,

Plaintiffs,

v.

No.: 10-cv-02477

GOVERNOR BRUCE RAUNER,
in his official capacity as Governor of
the State of Illinois; and SEIU
HEALTHCARE ILLINOIS & INDIANA,

Judge: Honorable Manish S. Shah

Defendants.

DECLARATION OF MELODY BENJAMIN

Melody Benjamin hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 35 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2010. I have provided care for my mother during that time. My work consists of helping my mother with all of her needs from bathing, preparing her food and giving her medication, to taking her to medical appointments and making sure her bills are paid.
3. When I began working in the Home Services Program, the State automatically deducted fair-share fees from my wages to support my union representative, SEIU Healthcare Illinois & Indiana ("Union"). I had no objection to providing financial support for the Union and I have no objection now. I believe that a strong union representative is necessary if home care workers are to be treated with the dignity and respect that we deserve. The wages I was paid then and the benefits I received were all the result of work by the Union. Because of that, I

believe that all home care workers should pay their fair share to support the Union because all home care workers benefit from the Union's activities. While I did not know much about the Union when I started in 2010, I did understand that the fees I paid went to the Union for all of the benefits I was getting.

4. When I started in 2010 my wage rate was \$11.55. Since that time I have seen my wages go up to \$13/hour under our current Union contract. That contract also requires the State to pay into a health benefits fund and for training. I do not believe that home care workers would have achieved this without a strong Union or that we will be able to continue to improve the status of home care workers without a strong Union. Like all home care workers, I am isolated on the job; I don't have a supervisor or coworkers to raise issues with. For that reason, maintaining a strong Union is critical for us. To me the Union gives us a voice. Together we are able to negotiate a fair contract with the State; otherwise we would just have to take whatever the State chose to give us. On a personal note, the Union has empowered me as a leader. I also believe that the training I receive helps me to provide better care to my mother. I know that I would not receive that training if it were not for the contract negotiated by the Union.

5. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. While attending training, I talked to one of the Union organizers, Latrell. I wanted to know more about where my fee payments were going. Latrell explained to me what the Union is, what it does and how the Union fights for me and other home care workers like me. This really opened my eyes and helped me to see how the Union was bargaining and fighting for me. After this conversation I thought, they are doing this for me when I am not even a member. I need to do my part. I decided to join as a member sometime around July 2011 and have remained a proud Union

member since. I now regularly talk to other home care workers about issues affecting us and encourage them to become Union members if they are not already.

6. I do not support this lawsuit or the goal of the National Right to Work Legal Defense Fund to weaken our Union. I don't feel that the named plaintiffs in this case speak for me. I don't agree that they should be able to enjoy the benefits of the Union's work and our collective bargaining agreement without contributing anything.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 4 day of August 2015.



Melody Benjamin