

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 LOLEASE BROCK

Lolease Brock hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 76 years old and live in East St. Louis, Illinois.
2. I worked in the Home Services Program for about two months in the spring of 2008. While working for the Home Services Program, I provided care for my daughter who was terminally ill.
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. 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. 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.

4. I do not believe that home care workers would have achieved the wage increases or benefits they've won without a strong Union. I do not believe that we will be able to continue to improve the status of home care workers without a strong Union. We need a good strong Union to speak for us.

5. I did not join the Union as a member through the Home Services Program. However, it's not because I don't support the Union. I have also been a DHS child care provider since about 2003, and in about 2008 I joined the Union as a member through child care. I have been a union member before when I worked in retail, so I know very well about the importance of being a part of a union.

6. I do not support the Harris v. Quinn lawsuit or the goal of the National Right to Work Legal Defense Fund to weaken our Union. The named plaintiffs do not represent me or speak for me. I do not believe it's fair that they want to benefit from the Union's work without contributing. I could use the money, but I don't want the Union to have to pay back the fees, because I believe my fees and my Union dues are well spent in the Union, and in home care workers.

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

Executed this 26 day of Sept 2015.

A handwritten signature in cursive script that reads "Lolease Brock". The signature is written in black ink and is positioned above a horizontal line.

Lolease Brock