

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 DENISE BROWN

Denise Brown 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 Joliet, Illinois.
2. I have provided care for my mother through the Home Services Program since about 2005. I prepare meals for her, do light housekeeping like laundry, help her get around the house and to and from doctors' appointments.
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 knew that the fair share fee was deducted because I was not a member and understood that the money went to the Union. I had no objection to providing financial support for the Union because I understood that the Union was responsible for getting the raises in wages I also saw in my paycheck. I believe that a strong union representative has been absolutely necessary for home care workers in the Home Services Program to have made

the improvements we have seen, and for home care workers 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. When I first started in the Home Services Program my hourly wage was only about \$8/hour. Since that time, including when I was not yet a member of the Union, I have seen regular raises in my pay to its current rate of \$13/hour. Our most recent Union 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.

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. My aunt was also a home care worker in the Home Services Program and a member of the Union. In about 2007-2008, my aunt started telling me more about the Union and encouraging me to become a member. At some point in 2009 or 2010, a representative of the Union came to my home to talk with me and I signed up as member right then. When the organizer came out I fully understood the impact the Union has had. I realized that all of the raises I had seen came from the work of the Union and that the Union had stopped cuts from the Home Services Program. Since then I have remained a proud Union member and have occasionally worked to recruit other members. If it were not for the Union, I might not even be able to talk to other home care workers. We don't have a break room or other place to gather together to simply talk about the issues affecting us, let alone organize to win improvements for ourselves and others like us. I feel that being active with the Union has helped me develop leadership skills and to be much more informed about what is happening in state and local politics affecting me and my family.

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. I do not feel that the Plaintiffs represent my interests or the interests of any home care workers in Illinois. I don't believe the Union should have to pay return fees to anyone; I do not want the fees I paid returned to me. I know that the Union used the money I paid to benefit all home care workers in Illinois.

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

Executed this 31 day of July 2015.



Denise Brown