

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 MARLENE BURTON

Marlene Burton hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 50 years old and live in Chicago, Illinois.

2. I have been working in the Home Services Program since about 2007. I have provided care my current client for about three years. The types of care I provide range from: assisting with bathing, toileting, and grooming, to cooking, going grocery shopping, doing laundry, light housekeeping, and accompanying my client to medical 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 had no objection to providing financial support for the Union. I knew the fees were ultimately going to support home care workers like myself. 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. Our current Union contract provides for pay of \$13/hour for home care workers, a significant hourly increase from when I first started working in the Home Services Program. The contract also provides for 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. I am particularly thankful for the health insurance coverage. Because of the work of the Union, I no longer have to be scared to go to the doctor because I don't know if I can pay for the appointment. With the insurance coverage, I know I can go to the doctor when I need to, and I believe my life and the lives of my children are better for it.

6. I have participated in several of the training classes, and I believe they have made me a better home care worker. In addition to teaching techniques and skills in caregiving, they also have helped me develop professionally. I believe the classes provide home care workers the chance to talk about our shared experiences and to learn from each other.

7. When I first started working in the Home Services Program, I remember receiving information about joining the Union. However, I had joined the Union through my work with a private home care agency and so I didn't think to join through the Home Services Program. I was quite familiar with the work the Union does, and the importance of becoming a Union member, but it just didn't occur to me to sign up. In about fall of 2013 I attended a training class where Union members reminded us to sign up on cards, and after being reminded, I signed up on the spot and have been a Union member ever since.

8. The Union has helped me stay informed about local and state politics and about policies that affect me and my clients. I do not believe that I would know about these issues, nor be as civically engaged without the Union. I believe the Union pushes me to be more involved in the democratic process.

9. 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 believe the named plaintiffs speak for me. I believe it is unfair that they are trying to weaken the Union that represents, and fights to improve the conditions for, all 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 17 day of Sept. 2015.

A handwritten signature in black ink that reads "Marlene Burton". The signature is written in a cursive style with a horizontal line underneath the name.

Marlene Burton