

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 BRENDA COLEMAN

Brenda Coleman hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 59 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2011, and I have provided care for my brother since I began. The types of care I provide include preparing meals and assisting him with feeding, bathing, dressing, exercising, accompanying him to medical appointments, assisting with medication, and assisting him in and out of his wheelchair and helping him get around.
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 wanted to pay, because I knew that the Union fought for me. The Union has done a tremendous amount of work for us, and 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 increase from when I first started, and for the State to pay into a health benefits fund and for training. Without the Union, I would not have health insurance. It has been a relief to know that I can go to the doctor when I need to, and that my prescriptions are so much more affordable than they were without insurance. 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 believe the training classes are very helpful. I believe I have learned new techniques that help me be a better home care worker, and help me care for my brother. For example, I've learned safer lifting techniques that make it easier to lift my brother, and stopped my back from aching.

7. I believe the Union helps build community amongst home care workers, and gives home care workers a forum to share our experiences. This is important to me because it helps home care workers know that we are not alone with our struggles, and to support one another. I also believe the Union has given me the opportunity to become more informed and civically engaged. I would not have been as informed, or as involved, without the Union.

8. 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. In about May of 2011, I attended a training class. Before the class began, a Union representative told us more about what the Union does, including advocating on behalf of home care workers with the

State for wage increases and other benefits. I thought about how I often cannot attend these events myself, and I wanted to financially support the Union that advocates for me when I cannot. After I learned more about the Union, I decided to join the Union as a member and have remained a Union member ever since.

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 or represent my views. I believe it is unfair that the named plaintiffs want to reap the benefits of the hard work of the Union, such as the wage increases, but don't want to contribute.

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

Executed this 24 day of September 2015.

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

Brenda Coleman