

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 CHAUNCEY COLLINS

Chauncey Collins hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 30 years old and live in Springfield, Illinois.

2. I have been working in the Home Services Program since about 2003. I provide care for two consumers currently, my mother and another consumer I am not related to. I have cared for my mother since about 2007. Even though I am not related to my other consumer, she is like family to me.

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. I truly believe that this Union has done wonderful things.

4. I made around \$7.35/hour when I first started in the Home Services Program. I had to take on another job part-time along with home care in order to survive. I needed to make more money to take care of my mother, myself, and care for our home. At the time it was very difficult, and sometimes we had to go without eating three meals a day. Our current Union contract provides for pay of \$13/hour for home care workers, which definitely has helped. I've been able to buy a better car to be able to get my mother to and from the doctor, I've been able to buy enough food to have extra in the fridge rather than going hungry.

5. I am so grateful that the Union won health benefits and training. I would be in so much debt if it weren't for the health insurance. I wouldn't be able to get most of the medication I need to take without the insurance. I am also diabetic, so if it weren't for the Union, I would not be able to afford the test strips, the needles, or insulin I need to live. 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. If we didn't have this Union, if we didn't have the Union to amplify our voices, I believe that we'd still be making \$7.35 or even less.

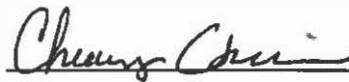
6. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. I didn't even know that we had lobby days or that we could talk to our representatives. I was one of those people who was really in the dark, I didn't know what was going on in politics, or about policies that affect me or my community. With the Union, now I know how to be more active and participate in the democratic process for myself, other home care workers and my community.

7. In about October 2011, I met a fellow home care worker who was a Union member at time-sheet drop off. He told me about what the Union does and encouraged me to attend a meeting. I attended a Union meeting in November of 2011 and I was sold. In about January of 2012, I attended a training class and signed up to be a member of the Union and have been a member ever since.

8. 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 speak for me or represent me. I don't believe it's fair for the named plaintiffs to say that they speak for all of us when we come from such different backgrounds and are in such different situations.

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

Executed this 26th day of Sept 2015.



Chauncey Collins