

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.

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DECLARATION OF TRACI CONEY

Traci Coney 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 Chicago, Illinois.
2. I have been working in the Home Services Program since about late 2007. I provide care for my sister, and have provided care for her since I started in the Home Services Program. I assist her with bathing, personal grooming, toileting, personal finances, and I prepare her meals, do her grocery shopping, accompany her to medical appointments.
3. Soon after 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, even though I wasn't yet a member. 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, even when we cannot get out and participate ourselves. Since I benefit from the increased wages and the training classes, even if I can't participate and advocate myself, I believe it is only fair that I financially support the efforts of the Union.

4. When I first started working in the Home Services Program, I believe I was making around \$9 or \$10 per hour. Our current Union contract provides for pay of \$13/hour for home care workers, a significant increase for me. Our 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. I gave up a career with health insurance to care for my sister, and it was such a blessing when, with the Union, we won health insurance.

5. I absolutely believe the training classes are useful. I have learned so much about how to provide better care for my sister, and how to keep myself safe and healthy to continue to be able to provide care. The training classes have also given me the opportunity to meet other home care workers. As a home care worker, I do not often have the chance to talk to fellow home care workers, and the training classes give me the chance to meet other home care workers, to commiserate, and to learn from their experiences. I believe the Union has helped provide home care workers a support network through these training classes, which has been just as valuable to me as the skills I've learned.

6. I believe the Union has given me the opportunity to be more civically engaged and informed than I would be otherwise. The Union is always letting me and other home care workers know about policies and politics that affect my client and me. The Union has

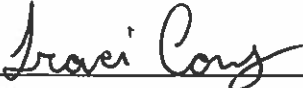
empowered me to find and use my voice in the democratic process, such as rallying in Washington, D.C. around the importance of home care workers.

7. 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. An organizer came to my house in about December of 2009, and told me more about the Union and how to join. After I learned more about the Union, I decided to join the Union as a member and have remained a Union 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. I do not believe the named plaintiffs speak for me or represent me. I have supported the Union even before I became a member. I do not believe it's fair that the named plaintiffs want to reap the benefits of the Union while not contributing. I wouldn't want the money back, I want the Union to keep the money. I understand that to have a strong Union, the Union needs resources, and I believe that a strong Union is important for 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 28 day of ~~September~~ 2015.



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Traci Coney