

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

THERESA RIFFEY, et al.,

Plaintiffs,

No.: 10-cv-02477

v.

Judge: Honorable Manish S. Shah

GOVERNOR BRUCE RAUNER,
in his official capacity as Governor of
the State of Illinois; and SEIU
HEALTHCARE ILLINOIS & INDIANA,

Defendants.

DECLARATION OF SAMANTHA CORZINE

Samantha Corzine 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 Eldorado, Illinois.

2. I have been working in the Home Services Program off and on since about 2000. When not working in the Home Services Program, I worked in facilities that provide care for people with developmental disabilities. In the Home Services Program I have provided care for four different consumers since 2000, including my father. My four consumers have required care with all types of daily activities as they have suffered from conditions ranging from dementia, Alzheimer's, strokes and severe chronic back injuries.

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 understood that this money was going to the Union and 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 work.

4. When I first started working in 2000, my hourly rate of pay was about \$7.85. Since then I have seen my wage rate increase to \$13/hour and for the State to pay into a health benefits fund and for training. I have benefited from all of these gains. In addition to the wage increases and health benefits, I have attended two training courses provided through the fund. I feel these courses have helped me to improve significantly the care I provide to my consumers. For example, in one of the training courses I learned how to talk with consumers struggling with depression and dementia. I do not believe that home care workers would have achieved any of 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. I was a new mother and was working hard to balance all of my responsibilities. I wasn't quite sure that I wanted to become a member. But then when I saw the raises we received in wages, the health benefits and the training courses available to us, I knew that I needed to become more involved. Sometime in 2013 I received a Union membership card in a packet of information from the Home Services Program. I signed and returned the card to the Union then because I wanted to become a part of something that actually mattered. I wanted to feel that I was actually part of making something happen and I believe the Union is a way to do that. For example, the Union fights to make sure that there are not cuts to the Home Services Program. This has a huge impact on me, other home care workers and our consumers. I believe that if it were not for our Union

advocating for the program in which we work, many of our consumers would end up in nursing homes. Since 2013 I have remained a proud Union member and have become a leader amongst home care workers. I regularly make calls and visits to the homes of other home care workers to talk to them about the issues we face and the importance of becoming a member. This year I am also a part of the negotiating committee for our bargaining with the State.

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. Those that want to reap the benefits that the Union provides without paying anything for it are freeloading on the hard work that I and others have done through the Union. I don't believe the Union should have to pay fees back to anyone. I do not want the fair share fees I paid returned to me. I feel that the Union used the money I paid to provide benefits like health insurance, dental insurance and everything that we are fighting for.

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

Executed this 4 day of August 2015.


Samantha Corzine