

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 BRITTANY DAVIS

Brittany Davis hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 25 years old and live in Bronzeville, Illinois.
2. I have been working in the Home Services Program since about 2013. I provided care for my uncle since I started in the Home Services Program until he passed in June 2015.
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, especially since I knew that the Union was fighting for me behind the scenes. 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 and for the State to pay into a health benefits fund and for training. Caring for my uncle through the Home Services Program gave me an income that enabled me to continue to go to school full time for my Bachelor's degree, and I'm sad that he won't be here to see me graduate in November. 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 has absolutely made me a better home care worker. The training gives us the proper techniques and skills to provide better care, and help home care workers meet certain professional standards.

6. The Union has given me a voice and I believe the fees we paid and our Union dues are like the oil that keeps the engine of the Union running. I believe I have become a stronger person because of the Union. I have been introduced to things that I didn't even know existed before I got involved. I have had the opportunity to meet so many people that care deeply about what they do. I find my fellow home care workers to be such a great support system. I am on the Bargaining Committee, and it is my first time, and it has given me the opportunity to develop leadership, communication, and negotiation skills. I have learned so much and grown so much because of the Union. I believe that the Union is the best way to get involved in my community and express myself and be heard.

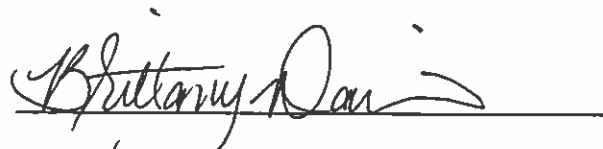
7. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. I attended a training class where LaTrell, a Union representative, explained about the Union. LaTrell gave me an opportunity to come down to the Union hall to learn more about how to get

involved, and at the Union I got the chance to meet other Union members. After I learned more about the Union, I decided to join the Union as a member in about March 2014 and have remained 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. I believe it is ridiculous that the named plaintiffs want to get their fees back while they reap the benefits of the Union's work. I don't believe that the named plaintiffs fully understand what the Union is about and all the good things the Union has won for home care workers. It's heartbreaking that the named plaintiffs don't want to stand in solidarity and support other 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 26th day of Sept 2015.


Brittany Davis