

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 JOHNNY DAVIS

Johnny Davis hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 55 years old and live in Chicago, Illinois.

2. I have been working in the Home Services Program since about May 2012. I have provided care for my brother-in-law during that time. My work consists of bathing, dressing, cooking and cleaning for my brother-in-law, as well as monitoring his asthma and helping him to get around and attend medical appointments.

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 and I have no objection now. At first I did not understand what the fees were for because I found the notations on my paystubs confusing. I called the Union to inquire. After that, I understood that the fees went to the Union for all of the benefits I was getting. 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. The wages I was paid then and the benefits I received were all the result of work by the Union. Because of that, 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. When I started in 2012 my wage rate was around \$10.75 or \$11/hour. Since that time I have seen my wages go up to \$13/hour under our current Union contract. That contract also requires 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. Without the Union, the State could decide to pay us a \$1/hour. The Union has also helped me to meet other home care workers and feel supported by a group. I have also benefitted from the work of the Union by attending many of the training sessions offered over the last three years. I have completed trainings in CPR and other areas that have significantly improved the quality of care I am able to provide to my brother-in-law. I find it very helpful to learn in a hands-on setting and from the experiences of other home care workers. I know that I would not have these opportunities if not for the work of the Union.

5. When I first started working in the Home Services Program I thought I had signed up to become a Union member. I am a loyal union man and have been a proud member of other unions at other jobs I've had. At some point in 2013 I became aware that I was not being treated as a union member, so I signed a membership card in May 2013. I have been paying membership dues since that time.

6. I do not support this lawsuit or the goal of the National Right to Work Legal Defense Fund to weaken our Union. I don't feel that the named plaintiffs in this case speak for me. I don't agree that they should be able to enjoy the benefits of the Union's work and our collective bargaining agreement without contributing anything.

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

Executed this 17 day of September, 2015.


Johnny Davis