

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 MILDRED DIXON

MILDRED DIXON hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 64 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2012. I provide care for my son, who is in chronic pain. I have been caring for him for almost fifty years even before I started in the Home Services Program. I enjoy the job because I love working with people.
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

know that the Union works for the good of people and they give you a fair voice and representation.

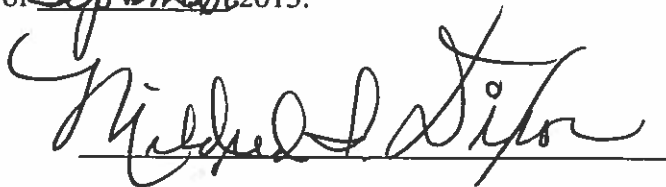
4. The current Union contract provides for pay of \$13/hour for home care workers and for the State to pay into a health benefits fund and for training. I have taken classes and training from the Union and enjoy them. I believe that I really get a lot out of the classes. They have been very beneficial as far as dealing with my son and dealing with other people. They have taught me so much about people that have disabilities that I was just not aware of before. 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. 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. After I learned more about the Union, in about November of 2012, I decided to join the Union. I have remained a Union member ever since. Whenever I attend Union meetings, I have been able to voice my opinion and it's not overlooked. The Union makes sure to give me the information I need and I believe the Union is very good about keeping me updated as to what is going on.

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

Executed this 28<sup>th</sup> day of September 2015.



Mildred Dixon