

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 STEVE GILLESPIE

STEVE GILLESPIE hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 56 years old and live in Chicago Heights, Illinois.
2. I have been working in the Home Services Program since about 2011. I currently provide 24-hour-a-day care for a male consumer. My consumer requires feeding tubes, so I am responsible for administering his food and medications as well as maintaining his feeding equipment. I also assist my consumer with laundering his clothing and linens as well as providing bathroom care. As my consumer has limited mobility, I also help him move about his home, and accompany him to and from doctor appointments and hospital visits. I have stayed overnight in the hospital with my consumer for days while he was transitioning into his tube-feeding regime, and this exemplifies the level of care I strive to provide my consumer.
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.

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. 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. As an active participant in the Union I have lobbied for the Union’s policies and initiatives. I know that our Union protects the rights of members like myself. Without the Union, workers would be lost and mistreated by our employers. I firmly believe in the necessity of a good, 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. Then, I was introduced to Reggie Olifant, a union organizer, who explained the nature and promise of the Union. Due to my family history, I already had a passion for home care work and healthcare, so I was excited to join the Union to further the cause to protect home care workers and promote workers’ rights and opportunities. After I learned more about the Union, I decided to join the Union as a member in about 2011 or 2012 and have remained a Union member.

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 believe the named plaintiffs are coming from a privileged standpoint void of individual need for the Union. I firmly believe that if they were to participate more in Union activities, they would understand why the Union is essential for

workers like myself whose lives would be taken advantage of without Union support. A strong union helps build character and helps communities at need.

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

Executed this 26 day of Sept 2015.



STEVE GILLESPIE