

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 VIRGINIA GRANT

Virginia Grant hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 58 years old and live in Charleston, Illinois.
2. I worked for my first client through the Home Services Program 20 years ago, but then left the program for a few years. I started working in the Home Services Program again in about 2001 and I have provided care for the same client ever since. My work consists of helping my client with all of her needs from bathing, dressing, toileting, grooming, feeding, light house cleaning, cooking, and laundry, to assisting my client keep up with personal correspondence, paying bills, and buying groceries.
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 knew how fair-share fees worked because some of my family members have been in unions. I had no objection to providing financial support for the Union. I

did not mind that fees were being taken out of my check because I knew they were going to support the work of the Union that ultimately benefits me. 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. My first wage while working in the Home Services Program was well below our current wage of \$13/hour, it was less than \$8/hour. In addition to a wage increase, our current Union contract provides for the State to pay into a health benefits fund and for training. The health benefits have been a huge help to me, as I have high blood pressure and am at risk of stroke without my medication. The insurance I have through the Union makes my medication much more affordable. 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 have worked in the health care field for over 30 years, and in many jobs that were not unionized. In those jobs, I saw no wage increases or better benefits. In home care, because we are isolated, it can be hard to know how to advocate for ourselves. With the Union, I have met many other home care workers going through the same things, and standing together we can fight and win wage increases and better benefits rather than taking what we're given without question. The Union has given me a voice, and a forum to use that voice to fight for myself and lots of other people. Since I have attended all of the trainings, I believe the Union has made me a better home care worker. I also believe that I have grown as a leader through being active with the Union. I used to have horrible stage fright, and through the Union I have been able to conquer my fear of talking in front of large groups of people, and even the media. I have

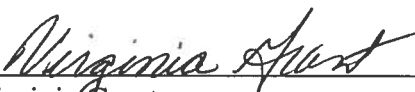
become much more politically aware since joining the Union. It has been a great experience learning more about politics and participating in lobby days to ensure that the Home Services Program is well funded, not just for home care workers, but also so that our clients can continue living at home.

6. 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 started receiving mailings in about 2009, and around July of 2011, I spoke with an organizer who came to my house. I signed up for membership on the spot, went to the next meeting and have been active ever since. I was on the bargaining committee in 2011 and am again this year, and I am also on the Executive Board.

7. 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 think the named plaintiffs understand what the Union does and the difference having the Union makes. Without the Union to help us stand up and fight, there might not be a Home Services Program to work for. It is absolutely not fair for people to get the benefits of what home care workers have worked for with the Union without contributing.

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 Aug 2015.



Virginia Grant