

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 DIANE GREEN

Diane Green 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 Blue Island, Illinois.
2. I worked in the Home Services Program since about January of 2014 until about September of 2014. I currently work for a home care agency. While I worked in the Home Services Program, I provided care for my ex-husband.
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'm all for the Union, I believe the Union is helpful because we cannot fight by ourselves. I have worked in other non-union jobs and I know first-hand how difficult it can be when you're on your own without the support of your coworkers or a Union to stand by you.

4. 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.

5. 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. When I worked in the Home Services Program, I attended every class they offered, including caring for diabetic consumers, high blood pressure, bed-making, CPR and First aid. I believe those classes are needed; they keep you informed on the latest techniques. The classes have made me a better home care worker and a better professional. Now that I work for an agency, I miss being able to take the classes. Another benefit of the training classes is the chance to meet and talk to other home care workers. This home care worker community provided support for me and helped me deal with specific situations by teaching from their own experiences.

6. The Union is a must to me, ever since I joined the Union I have participated in the rallies and door-knocking, I have attended leadership classes. The Union has taught me leadership and organizing skills, and has given me the opportunity to have my voice heard in politics and to our elected officials in Washington, D.C. I believe the Union is important in elevating the work of home care, and to make people understand how necessary home care work is.

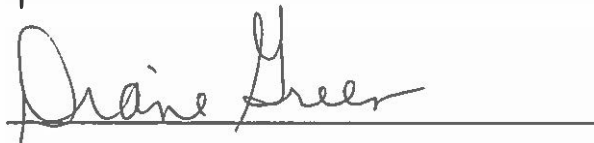
7. Before I began working through the Home Services Program, I worked for a private home care agency. I became a member of the Union through my agency in about 2010. Therefore, when I first started in the Home Services Program, I already knew about the Union,

and in about February of 2014, I went to the Union office and I signed a card there to join as a member.

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 don't believe the named plaintiffs represent me or speak for me. I believe the named plaintiffs don't understand the importance of the Union and the benefits that they already receive are because we have a strong Union that we support. I don't believe it's fair that they want to reap these benefits without contributing. I would not want the fair share fees I paid back, because I believe my money went to good use and I want the Union to have it.

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

Executed this 25 day of Sept 2015.

A handwritten signature in cursive script that reads "Diane Green". The signature is written in black ink and is positioned above a solid horizontal line.

Diane Green