

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 ROCHELLE HORANEY

Rochelle Horaney 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 Galesburg, Illinois.
2. I have been working in the Home Services Program since about 2006. I provided care for the same consumer for seven years until 2013. Since then I have cared for another 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. Before I started working in the Home Services Program, I worked for a home care agency and was a member of the Union, and I paid full dues. After I left the home care agency, my membership in the Union lapsed. At the time, I did not have enough hours in my mind to justify paying full membership dues, because I didn't realize the dues were paid at percentage of my

wages, I thought it was a flat fee. So instead I chose to pay fair share fees, because I received the benefits of the Union and wanted to contribute. 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. I was paid about \$9/hour when I first started in the Home Services Program, with no benefits. The wage increase to \$13/hour in our current Union contract has made it possible for me to catch up on my bills, so I don't have to worry and be stressed about receiving shut off notices every month. I am able to put food on my table and keep a roof over my head without having to rely on the State to provide those things for me.

5. Our current Union contract also provides for the State to pay into a health benefits fund and for training. I believe the training classes have been so helpful. The training provides us with knowledge we need to make our consumers and ourselves safe. For example, the training classes have taught me the proper techniques for safe lifts and transfers, and universal precautions that help keep consumers and home care workers safe and healthy. I do not believe there is any way 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.

6. I believe the Union enables home care workers to have a support network. For example, when I have questions about how to care for my consumer, I know I can ask any of my fellow home care workers that are members of the Union, and I can learn from their experiences. I am confident and can trust other home care workers that are part of the Union because I know them, and I know that because they are also involved in the Union they want to support me too and give me good advice.

7. Being involved in the Union has had a real positive effect on my life. Due to the nature of home care work, I do not often have down time. But because of the Union and the connections that I've made, I have social contacts I wouldn't otherwise have. I also am more informed about what's happening in my state and around the country that I wouldn't know about without the Union. The Union also provides me a professional network, and through this network I have been able to find employment opportunities that I would not otherwise know about.

8. In about July of 2006, when I was able to get more hours for my first consumer, I attended a Union meeting and was approached by other members of the Union. They explained to me how the dues were paid as a percentage of my wages rather than a flat fee. They then presented me the opportunity to sign up as a member again, and I voluntarily joined and have been a member ever since.

9. 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 believe the named plaintiffs speak for me or represent me. They have never approached me, or asked me if I want them to speak for me. I do not believe the named plaintiffs fully understand what the Union is all about, and I invite them to come to a Union meeting to learn more about how important the Union is to so many home care workers. I cannot understand why anyone would not want a Union to fight for wage increases and for better benefits. I think it is unfair that the named plaintiffs benefit from the contract that the Union has fought for, but do not want to contribute.

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.

A handwritten signature in black ink, appearing to read "Rochelle Horaney". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Rochelle Horaney