

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 ROSHOONDRIA LEACH

Roshoundria Leach hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 33 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2007. I have provided care for my father for that entire period. I have also worked for a private home care agency.
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 and none of us should benefit for free.


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. Without a Union it would be extremely hard for us to make any improvements. Like other home care workers, I don't have anyone else to speak for me on the job. This is the reason I became a member. This is also the reason I have reached out to other home care workers to talk to them about why we are more powerful together.

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. As a result, at some point in 2010 I went to the Union's office to get more information and educate myself on what the Union is. I recall speaking with a number of people there, including Stephanie Knight. After I learned more about the Union, I decided to join the Union as a member sometime in late 2010. I have remained a Union member and have worked since then to recruit other members.

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 do not feel that the Plaintiffs represent my interests or the interests of any home care workers in Illinois. They are trying to tear us down with this lawsuit, not help us out.

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

Executed this 4th day of August 2015.


Roshoundria Leach