

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 JOYCE LIGHTSEY

Joyce Lightsey hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program, and for a private home care agency. I am 60 years old and live in Galesburg, Illinois.
2. I have been working in the Home Services Program since about 2010. I provided care for my mother through the Home Services Program when I first started, and since then I have cared for consumers that I am not related to.
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.
4. I have always been a union member. Even before I was in home care, I worked for Maytag where I was represented by a union, so I was familiar with the idea of a fair share fee and I didn't have a problem with paying. I have also been a member of the Union through my

home care agency since 2006, and so I was familiar with this Union in particular and the work that it does.

5. I was really happy that my home care jobs had a Union. I have also worked at a non-union assisted living home, where we were not treated well, and 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.

6. With the Union, I didn't have to look behind my back all the time, or worry about losing my job. I knew that the Union was there to support me and have my back. I have also had the opportunity to travel and participate in politics, including meeting representatives and other elected officials in Springfield. I get to meet new people, and learn new skills like leadership. I have learned new things through every experience I've had with the Union, things I've never done before and would not have done without the Union including phone-banking, door-knocking, and bringing people to the polls to vote. 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.

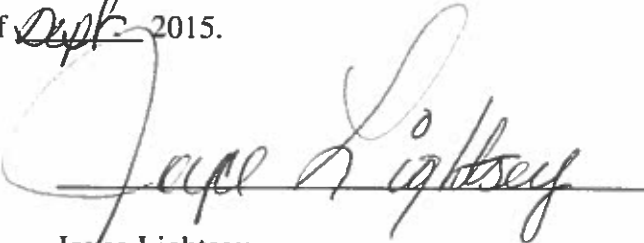
7. I didn't sign a membership card through the Home Services Program until about December of 2013. The reason I didn't sign up beforehand is simply because I didn't know to sign up, since I was already a member through my home care agency. I assumed the fair share fee they were deducting meant that I was a member of the Union through the Home Services Program. When I started getting more involved with the Union, such as volunteering on campaigns and trying to sign up new members, I found out that the fair share fee was not the

same as paying full Union dues. After I learned this I signed up on a membership card and have remained a member ever since.

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 believe the named plaintiffs do not fully understand about the Union, or how vital the Union is to home care workers. I believe the work we do for the Union supports not only home care workers but also our consumers. I believe that the Union has helped train home care workers to provide better care for their consumers, and this could not be done without the financial support of home care workers.

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.



Joyce Lightsey