

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 CATALINA LUNA

Catalina Luna 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 Chicago, Illinois.
2. I have been working in the Home Services Program since about September 2009. I provide care for my son. The type of care I provide on a daily basis includes helping him up, assisting him with toileting and bathing, dressing, cooking, laundry, light housekeeping, and often I accompany him to medical appointments.
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 believed it was a good thing, because 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 earned around \$9.55/hour when I first started with the Union, and in 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 have benefitted from the classes, and believe I am a better caregiver because I have completed the classes. 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. If it wasn't for this job and for the Union, my family and I would not eat, and I would not be able to send money to my family in Mexico.

5. I believe that being a part of the Union has helped me develop leadership and organizing skills, and has taught me to be an advocate for myself and my fellow home care workers. I really appreciated the opportunity to travel to Springfield, IL to meet with our representatives to show them the importance of supporting home care workers. I also believe that being a member of the Union has helped me be a better caregiver and advocate for my son, by giving me the opportunity to support policies that will help my son, as well as the training to give him better care.

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. Around June 2011, I received a notice in the mail about a meeting at the Union, and I attended because I wanted to stay informed about issues concerning me, other home care workers, and our clients. When I attended the meeting, an organizer talked to me about the Union and being more

involved. I learned more about the Union, I decided to join the Union as a member that same day, and have remained a Union member.

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 it's fair or right for the named plaintiffs to say that they represent all home care workers. I also don't think it's fair that they want to get the fees they've paid back while still getting the benefits from the Union contract. I believe it took a lot of time and hard work on behalf of the Union to win those benefits, and we all should contribute.

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

Executed this 3 day of August 2015.

Catalina Luna

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