

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.

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**DECLARATION OF OVADHWAH "OJ" MCGEE**

Ovadhwah "OJ" McGee hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 37 years old and live in Chicago, Illinois.
2. I have provided care for my mother through the Home Services Program since about 2011. I prepare meals for her, do light housekeeping, help her get around the house and to and from appointments, and I also help her manage her diabetes with medicine reminders and also assisting her with doctors' 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 have been a union member before, so I knew what the fair share fee was and what the money went towards. I had no objection to providing financial support for the Union. I believe that a strong union representative has been absolutely necessary for home care workers in the Home Services Program to have made the improvements and gains that we

have seen, and for home care workers to be treated with the dignity and respect that we deserve. I am a big believer in unions, and 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. 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 taken advantage of many of the classes, and it has been a great cost-saver to be able to take the CPR class each year for free, as well as learning about new techniques and changes in the home care field. It has made me a better caregiver. 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.

5. I believe that being a part of the Union is like having a second family that will stand with you and fight for you and for fair treatment on the job. I would tell anyone, even if they were just starting out in this field, to make sure where they are looking to get hired has a union. I have worked in non-union jobs in the health care field before, and I know that it is much harder to negotiate wages, or even time off, without a union, because the boss has the final say so and there is no other process for workers to have their voices be heard.

6. When I first started working in the Home Services Program I was not familiar with everything our Union does or how to get involved. However, it only took a single one-on-one conversation with a member volunteer in about 2013 for me to sign up and start participating in meetings. I started learning more about what the Union does, and took a more active role on the bargaining committee, and volunteered for actions down in Springfield. While overall I have been with SEIU on and off for over 15 years, being a part of this Union with my fellow home care workers has helped me develop as a leader and organizer. It has given me the chance to hear

other people's stories, and to know that I'm not alone in what I'm going through and that we will stand together.

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 believe the named plaintiffs speak for me nor do they represent my views. It seems paradoxical that the named plaintiffs want to reap all the benefits of the union but do not want to contribute anything towards the cost of getting those benefits. Lawyers aren't free, taking the time to sit down with the State and negotiate doesn't come free, and I'd rather pay a small percentage of what I'm bringing in to make sure I still have a job, good wages, benefits, and a fair process at the end of the day.

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

Executed this 30 day of July 2015.

  
Ovadhwah McGee