

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 LESLIE MOORE

Leslie Moore hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 55 years old and live in Galesburg, Illinois.
2. I have been working in the Home Services Program on and off starting in about 2006. I currently provide care for one consumer. I assist my consumer with toileting, bathing, personal grooming, running errands, cooking and cleaning, and medicine reminders. My consumer is my priority and that is why I am part of the Union.
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 saw that the fee was deducted, but I had no objection to providing financial support for the Union. I come from a union family, and I have worked in non-union jobs and have seen how workers without a union can be fired for nothing. 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. I also believe that the Union is important for consumers as well. The reason I got so vocal was because I found out about potential budget cuts to the programs that provide care for seniors and people with disabilities in my state.

4. When I first became a home care worker in the 1980s, I was being paid around \$1.50 an hour. 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. I believe that the Union is necessary to elevate the status of home care workers by giving us a voice to show elected officials that we are health care professionals and not just numbers.

5. I believe the trainings are very helpful. I have been so impressed by our instructors. I don't often get to see other home care workers on the job and it is difficult to get training. I have learned new skills and techniques that have made me a better and a more professional home care worker. I have also been able to learn from other workers' experiences, and to share my insights as well. I believe the training classes also give us a place where we can meet other qualified home care workers that we can ask for shift coverage if we need to take time off. If I need coverage, I want someone who I know and trust, and I believe that home care workers I meet at these trainings are qualified.

6. Besides the wage increases and the benefits in the contract, I have gained many other skills being a part of the Union. I believe I have developed my organizing skills, and

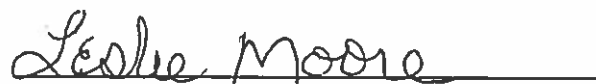
learned new storytelling skills to help lobby my elected officials. I would not have known as much about politics or how to participate without the Union.

7. 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. In about April of 2011, my friends Joyce and Deb who are also home care workers and Union members, encouraged me to come out a Union meeting they were going to have in my town. I've known my friend Joyce all my life, and when she described to me how the Union goes out and fights for home care workers and consumers every day, I knew I wanted to sign up to be a member. Around that same time, an organizing intern, Jake, came to my house and offered me Union card. I signed up as a member and have been a member ever since, even when I didn't have a consumer.

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 do not understand why the named plaintiffs want to bring this lawsuit. I do not believe the named plaintiffs fully understand the work of the Union. We're not like a corporation with endless resources, if we want to advocate for ourselves and fight for better wages and benefits we need to pool together the money. I don't believe they understand that the workers are the Union, and the Union helps us fight for our consumers too.

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

Executed this 9 day of 26 2015.

A handwritten signature in cursive script that reads "Leslie Moore". The signature is written in black ink and is positioned above a solid horizontal line.

Leslie Moore