

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 THERESA NELSON

Theresa Nelson hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 45 years old and live in Belleville, Illinois.
2. I have been working in the Home Services Program since about March of 2014. I provide care for one consumer currently, and I have cared for him since I started in the Program.
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. I support our Union, and I believe that home care workers need a strong Union.

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. When I first started I was making about \$11 per hour, and the wage increase to \$13 has been a huge help to my family. Before the wage increase, I was at times behind on my bills, and had trouble paying for my medication, and for school supplies for my son. With the increase, I've been able to pay my bills, put food on the table, pay gas, and help my son. 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 didn't even know we had a Union until I heard about the training classes. I believe the training classes benefit me because they teach me how to provide better care to my consumer. Home care work to me is not just a job, I really care about my consumer and the training classes have helped me provide better care. I do not believe I would have had the same training without the Union.

6. I have also benefitted from all the information the Union sends about policies and politics in my state that affect my consumer and me. The Union keeps us informed, and gives us the opportunity to participate and to make our voices heard.

7. In about July of 2014, I was attending a training class when a representative from the Union told us about what our Union does and how to join. I didn't even know before then that we had a Union, as soon as I learned more, I signed a membership card and have remained a Union 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 do not believe the named plaintiffs represent me or speak for me. I believe this lawsuit is just about weakening our Union, and I believe that

weakening our Union is bad for our consumers. Without our Union, we wouldn't have the training we need to provide better quality care for our consumers, nor would we have the same voice to advocate on behalf of home care workers or our consumers to our elected officials.

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 September 2015.

A handwritten signature in black ink, reading "Theresa Nelson", written over a horizontal line.

Theresa Nelson