

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 TERRY PEARSON

Terry Pearson hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 59 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2010. The types of care I provide for my client ranges from bathing, dressing, grooming, feeding and feeding tube maintenance, to laundry and accompanying my client 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 have worked in the health care industry since 1986 and have been in several unions, and I believe that unions are good. 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. With a strong union, workers have a better chance of being heard. When we act together, we can make a lot of noise and the State cannot sweep our issues under the rug.

4. Currently, our Union contract provides for pay of \$13/hour for home care workers, up from a little over \$11/hour when I first started, and for the State to pay into a health benefits fund and for training. I know for myself, the health insurance has been a huge benefit. Without it, some of my medications would cost me upwards of \$200, and I would not be able to afford them. I have also benefitted from the training classes. I have learned a lot from both the instructors as well as my fellow home care workers. The classes give us the opportunity to trade strategies and ideas around issues we commonly face. 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. Beyond the financial benefits the Union has won for us home care workers, I believe the Union is so important because it keeps us informed about different issues that affect home care workers on the local, state, and national level. Also, I know that the Union supports me and my fellow home care workers, and fights for our rights even when we cannot take the time to participate.

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 2011, after learning more about what organizers for the Union did, I wanted to be more involved and I decided to join the Union as a member. I wanted to learn how to reach out to my fellow home care workers and help organize for better wages and benefits. I have appreciated the opportunity to participate in lobby days, and be more involved in the political process.

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, I know I speak for myself. I don't believe that the named plaintiffs understand what the Union has won for all home care workers. I believe that without the Union, home care workers would have been able to achieve the gains we have seen in our increased wages and benefits. I believe that the fees and membership dues we have paid and pay today are small in comparison to the benefits we get from the contract and being a part of the Union. I think it's unfair that the named plaintiffs want to enjoy the benefits of hard work we do with the Union without having to contribute.

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

Executed this 4 day of August 2015.



Terry Pearson