

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 ALBERT PIGGEE

ALBERT PIGGEE hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 24 years old and live in Markham, Illinois.

2. I have been working in the Home Services Program since about 2011. I have provided care for the same client since joining the Home Services Program. I typically provide cooking and cleaning services for my client, and I also run errands for my client and help my client walk.

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. My mother was in the same Union, and I knew about all the good work the Union does from when I was a child. 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 am grateful to the Union that our wages are up to \$13/hour. Without these wage increases, it would be much more difficult for me to pay rent. 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 firmly believe that home care workers would not have even a margin of such important benefits like we do today without the Union.

5. Our current contract also provides for the State to contribute to a health benefits fund and for training. I believe the training classes help a lot, and have made me a better home care worker.

6. When I first started working in the Home Services Program I was familiar with the work of the Union and the importance of being a member, but I didn't sign up right away. I frequently talked to Michelle, a child care union activist, about the importance of unions when she would drive my mother and myself to Union events. I remember Michelle told me that one voice can't do what a million voices can do, and this inspired me to join the Union to fight for workers' rights. After I learned more about the Union, I decided to join the Union as a member in about 2012 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 firmly believe that we all have to pay our dues. Our dues pay for what the Union does, and we rely upon the Union for benefits, support, and rights.

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

Executed this 28 day of Sept 2015.

  
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ALBERT PIGGEE