

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 LAURA ROBERTS

Laura Roberts hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 46 years old and live in Chicago, Illinois.

2. I have been working in the Home Services Program since about 2009. I have provided care for the same client since I began working in the Home Services Program. The types of care I provide range from assisting with bathing, grocery shopping, cleaning, cooking, accompanying to medical appointments, grooming, occasionally with dressing and toileting, running errands, and medicine reminders.

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 believed those fees were dues, and that I was a member of 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 believe that home care workers need the Union, and that the Union helps advocate for home care workers and other low-wage workers in the State of Illinois.

4. Our current Union contract provides for pay of \$13/hour for home care workers, a significant increase from when I first started, 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.

5. I have attended a few of the training classes and I believe they are helpful. I believe the classes have made me a better home care worker. I believe the classes are helpful because it give me the chance to learn from more experienced home care workers as well as the instructors.

6. The union has given me the opportunity to be a part of a state-wide home care worker family, and to travel to Springfield, IL to rally for home care workers. I believe that I would not be as informed about policies that affect my client and me or as involved in the politics of the State, 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 July of 2014, a member volunteer came to my house and told me more about the Union, and I wanted to help out and be a part of it. I decided to join the Union as a member on the spot and have remained a Union member.

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. I believe the named plaintiffs are trying to have it both ways: reaping the benefits from the Union contract while not contributing to the Union's efforts. I'd rather have a Union that is strong, and can continue the fight for \$15 an hour.

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

Executed this 25 day of Sep 2015.

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

Laura Roberts