

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 ROSIE SCOTT

Rosie Scott hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 66 years old and live in Harvey, Illinois.
2. I have been working in the Home Services Program since about 2011. I have provided care for a friend since I started in the Home Services 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.
4. When I first started in the Home Services Program I made about \$11.75 per hour, but now with our current Union contract, I make \$13/hour. Because of the wage increase, I've

been able to help take care of my daughter and my granddaughter, and put more food on the table, and pay for car insurance. I would not have been as able to pay for those things without the increase. Our contract also provides 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 really like the training classes, they have taught me a lot of skills and techniques that I can use to provide better care. For example, I've learned how to make a bed while someone is still in the bed. These skills and techniques are so important, not just to make home care work safer for home care workers, but also better for consumers.

6. I believe the Union has helped me grow in a number of ways. I appreciate that the Union has given me the opportunity to get my voice heard by elected officials in Springfield. I have learned a lot about leadership and organizing by participating with the Union. I would not have been as involved, nor would I have grown as much as a person, without the Union.

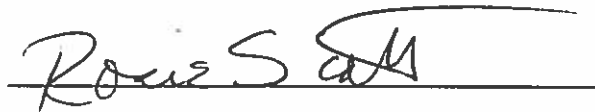
7. When I first started working in the Home Services Program I did not know much about our Union or the importance of becoming a Union member. In about July of 2012, I attended a training class where a representative told us more about the Union, and how to join. Prior to that, I hadn't joined mostly out of laziness. After I learned more about the Union, I decided to join the Union as a member on the spot and have remained a Union member. I try to come to everything I can, and I'm very supportive of the Union.

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 speak for me or represent me. I believe the named plaintiffs should contribute to the Union because they still

benefit from the Union's work. I don't believe the named plaintiffs should get to speak for all home care workers, because they don't know the situations that many of us are in. The named plaintiffs might not need the health insurance or the wage increases, but many of us do, and many of us want to fight with the Union for those things. I believe it's so important for people to be involved and participate in the Union, we need to fight for the things we want and deserve. Most things don't come on a silver platter and I believe we need a strong Union to help us fight for the things that we need.

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 Sept. 2015.

A handwritten signature in black ink, appearing to read "Rosie Scott", written over a horizontal line. The signature is stylized with a large, sweeping flourish at the end.

Rosie Scott