

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 KENYA SMITH

Kenya Smith hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 46 years young and live in Riverdale, 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've provided my client have changed over the years, and it has been important to develop a strong working relationship based on trust. I assist her with bathing, toileting, dressing, personal grooming, prepare meals, her personal finances, going grocery shopping, giving medicine reminders, light housekeeping, and accompanying her 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 am glad to have paid the fees, because I can see how much I have benefitted from 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. Our current Union contract provides for pay of \$13/hour for home care workers, a significant increase from when I first started. 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. I believe the health insurance has been a huge benefit, and has made a big difference in my life. Without the insurance I would not have been able to afford necessary medication. I also believe that the training classes helped me develop skills and techniques to better care for my client. I believe I am a better home care worker for having taken the classes.

5. I believe it is wonderful that the Union gives us home care workers an opportunity to stand up and speak out. I have had the opportunity to tell elected officials about my personal story, and how important homecare work is and how important it is to be paid enough to take care of our families and our clients. I really like being involved, and I appreciate how the Union keeps us informed about policies that affect home care workers. I would not have been involved or as informed without the Union.

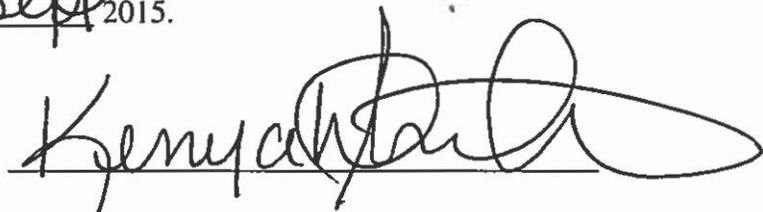
6. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. In about September of 2009, Sharron, a child care provider and member of the Union, came to my house to talk to me about the Union. After Sharron told me more about how the Union fights for our

rights, and how the Union was fighting to get us health benefits, I decided to join the Union as a member and have remained a Union member ever since.

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. To me, this lawsuit seems crazy. It does not make any sense to me that the named plaintiffs would want to reap the benefits of the Union but not want to contribute. I believe the Union has your back if something happens on the job, and I believe it's important that we invest in the strength of the Union so that the Union can better fight for us. I don't mind paying dues, because I know the Union has my back, just as I have my client's back. The Union has made my job a true vocation and career that I love to do. I am worried that if the named plaintiffs succeed in weakening the Union, I stand to lose out on all the gains we've made as workers. Because of the pay raises and the benefits, I've been able to buy my own home and my own car, and avoid going into medical debt. I wouldn't even want to get any money back because I know that what we've won with the Union is worth so much more.

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.

A handwritten signature in black ink, appearing to read "Kenya Smith", written over a horizontal line.

Kenya Smith