

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 ROSIE SMITH

Rosie Smith hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 64 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2012. I have provided care for my son since I began working in the Home Services Program. The types of care I provide range from assisting him with bathing, medicine reminders, cooking, cleaning, and laundry, to helping him with groceries and shopping and treating his asthma.
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 knew from the very beginning that such fees were being taken out of my paycheck, and 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 feel that being represented by the Union is like being a part of a family that supports me and has my back.

4. 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 knew that the fees I paid went to help the Union operate more effectively, including fighting for me when my voice alone was not enough to make a difference. I love my Union and while I would want a union to represent me at any job I have, I believe it is especially important for home care workers because we often work alone, and do not often have the chance to come together and support each other.

5. When I first started working in home care for a private agency in about 2002, I earned about \$5 per hour. Our current Union contract provides for pay of \$13/hour for home care workers 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 these wage increases and benefits without a strong Union or that we will be able to continue to improve the status of home care workers without a strong Union.

6. I believe the Union has helped me become a better home care worker. I enjoy attending the classes and have enhanced my skills. The classes have also given me an opportunity to learn from my fellow home care workers and their experiences. I believe the Union helps to keep me informed on the latest techniques and information on how to be a good home care worker, and I learn something new in every class.

7. I believe the Union has helped me be more involved in politics and more informed about policies affecting me and my son. Even though I am not always able to participate, I am glad to know that the Union is able to raise up my voice along with other home

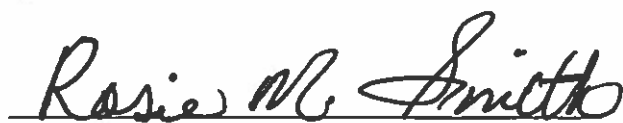
care workers in advocating for us and our consumers at the state and national level. I would not have been as informed without the Union.

8. When I first started working in the Home Services Program, I remember receiving information in the mail about the Union, but I was not familiar with everything our Union does and with the importance of becoming a Union member. After I began attending the training classes and learned more about the Union, I decided to join as a member in about 2013 and have remained a Union member.

9. 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. The named plaintiffs do not speak for me. I believe the fees I paid to the Union helped make the Union a better advocate for me and all other home care workers. I believe it's sad that the named plaintiffs, who are benefitting from the work of the Union, want to get their money back.

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

Executed this 23 day of Sept 2015.



Rosie Smith