

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 CLARENCE STANBACK

Clarence Stanback hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 49 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2010. I currently provide care for one client, assisting with bathing, dressing, cooking, medicine reminders, to accompanying my client to medical appointments, and with errands and grocery shopping. I enjoy what I do, and I believe my work is important because like many other homecare workers, my client does not have family to care for him.
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 knew what the fees were for and 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 the Union is

there to support and fight for all home care workers. Every job I've had I've been in the Union, working on the railroad, in construction, and in nursing homes. 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 in the Home Services Program. Our contract also provides for the State to pay into a health benefits fund and for training. I have appreciated the health insurance, and I believe that without it, I would not be able to afford my medical appointments or prescriptions. 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 believe the training classes help professionalize home care work. I believe that I have learned many new techniques and skills from the classes. For example, while I believe most people know how to make a bed, in attending the training class I learned that there is a proper way to make a bed, and the training class helps set a standard for home care workers. I believe the first aid training class is another example of professionalizing home care work, because in attending that class I feel more prepared and able to handle any situation that may arise while caring for my client. I also believe the classes are important because it gives home care workers the opportunity to share information, and learn from each others' experiences.

6. I also believe that the Union has helped me become more informed about policies that affect my client and me, and has given me opportunities to be more involved in the political process. I have marched in downtown Chicago, and in Springfield with other home care workers and our Union. I believe it's important to be informed, and I don't believe that I would or could

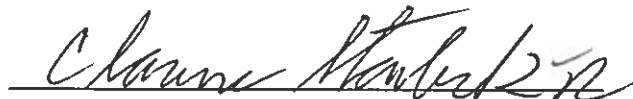
be as informed about policies that affect me, and about politics, without the Union. I don't believe that many other entities besides the Union would dedicate as much time and as many resources to informing home care workers, and encouraging home care workers to be more civically active.

5. When I first started working in the Home Services Program I was not familiar with everything our Union does or how to sign up to be a Union member. In about December of 2011, I attended a training class where a Union representative explained about the work of the Union and encouraged us to sign up. Since I was familiar with unions already, I signed up to be a member on the spot. I've also volunteered to help sign up other home care workers as well. I have remained a Union member ever since.

6. 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 can't find it in my heart to support any lawsuit trying to weaken the Union that I believe in and support. I believe the union dues I pay, and the fair share fees I paid, are and were ultimately invested in me, and help the Union support me. I believe it is unfair that the named plaintiffs want to benefit from the Union's work and the Union contract without contributing.

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 cursive script, appearing to read "Clarence Stanback".

Clarence Stanback