

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 PARALEE STEWART

Paralee Stewart hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 58 years old and live in Centreville, Illinois.

2. I have been working in the Home Services Program since about April of 2013. As a home care worker, I have provided care for clients with multiple sclerosis. Some of the types of care I have provided include: cooking, cleaning, bathing, dressing, taking clients to the grocery store, helping clients run errands, setting up appointments, talking to doctors, physical therapists, and occupational therapists so I could continue therapy at the clients' homes.

3. When I began working in the Home Services Program, I saw the Union card in the packet of materials I received from the State, but did not pay much attention to it. I noticed that 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 that the fees were a part of the procedure of working

in the program. 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. Before I became a home care worker, I worked as an administrative assistant for the City of East St. Louis. While there was a civil service union, it was not very active and I was not a member. In my time with the City, I saw that those of us who were not in active unions did not receive any wage increases. We were often told that due to budget constraints, there was no way we could get better wages or benefits. However, the police officers and firefighters who did have unions won wage increases and better benefits. Ever since, I have believed that a strong union is of vital importance to give voice to those who do not have enough power individually to bargain for better wages and working conditions.

5. 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 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 would never have imagined I could be getting paid \$13/hour. It has been a fantastic experience being involved in the Union. I have found the training classes to be very useful, and I have appreciated the opportunity to get to know my coworkers and to learn from their experiences.


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. However, after my first month working in the Home Services Program, my client received a call saying that I could only be a paid home care worker to my client for another two weeks. I did not

understand why, and I knew that my voice alone would not be enough to resolve the issue. I believed the Union could help me. I called the Union and they said that they would try to figure out what was going on. I continued to provide care for my client while waiting for the State to reevaluate her level of need. After one month, I was officially hired. Once I was hired, I became more active in the Union. I attended a training class where I met an organizer who talked to me about signing up to become a member. I knew from experience that working alone without the protection a Union provides left me vulnerable, and I appreciated that when I needed help, the Union was there. I decided to join the Union as a member in July, 2014 and have remained a 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. I do not believe the named plaintiffs represent me. It seems as if the named plaintiffs do not want to pay their fair share, but they want to ride on others' coattails and benefit from the hard work of others. I don't think it's fair that the Union should have to return the fees paid by the plaintiffs. To me, this is the equivalent of asking plaintiffs to give back everything else that can be attributed to the work of the Union.

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

Executed this 4th day of August 2015.


PARALEE STEWART