

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 ANDRE SYKES

Andre Sykes hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 50 years old and live in Springfield, Illinois.
2. I have been working in the Home Services Program since about 2008. I have provided care for the same consumer for the past seven years. I am not related to my client.
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've been in union jobs before, so I knew that a fair share fee had something to do with the Union. For example, I've been fired from a job where the union I was in was able to get my job back, so I believe in unions. 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. I started out in the Home Services Program making \$9.45/hour. Our current Union contract provides for pay of \$13/hour for home care workers. When I do the math, this comes out to around \$140 more per pay period, that's a significant increase that makes a real difference in my life and in my family's lives. I have been able to afford a car and car insurance, and to be able to buy books and other school supplies for my children. The wage increase has been a huge help because it helps us cover all of our expenses a little better.

5. Our contract also provides for the State to pay into a health benefits fund and for training. I believe the training is so very important. We are caring for vulnerable people and it is so important that we know how to properly handle bodily fluids, lift and transfer our consumers, to keep them safe and to keep us healthy and safe so we can continue to provide care. Also, home care work can be stressful work and I believe one of the most important classes I've taken was about how to handle the stress and promote mental health for home care workers. 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.

6. I am a diabetic so the health insurance has been a huge benefit to me, insulin costs almost \$100 a bottle without insurance, and with the insurance I pay less than \$15. Also, with our children going to the doctor once or twice a year, it helps tremendously. Without the Union and the without the health coverage I'd be in big trouble, I would be stuck with all these medical bills that I cannot afford.

7. I have learned so much being a part of the Union that I would not have known otherwise. I went from knocking on doors to lobbying our elected officials about policies that

affect home care workers and our consumers. I believe the fees I've paid and the Union dues I pay now are so important because they help fund the Union's efforts to increase homecare workers wages and get the health insurance, and also to ensure that elected officials know how important home care work is.

8. When I first started working in the Home Services Program I was not fully aware that we had a Union. In about October 2010, a coworker of mine came to the door and told me about the Union. After I learned more, I signed a card on the spot to become a Union member. A few months later, my coworker came to my house again to tell me to come out to the Union Christmas party. I attended and immediately learned more about how to get involved, and have been active ever since.

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. I believe the named plaintiffs don't understand what many of us go through, and I wish they would walk a day in my shoes to understand how important things like the health insurance truly are. I do not believe the named plaintiffs represent me, I don't want to see my Union weakened. I would not want any fees I've paid back from the Union because I believe it's important to invest in and support the Union.

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 Spt 2015.



Andre Sykes