

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 VANDA TALKINGTON

Vanda Talkington hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 57 years old and live in Wood River, Illinois.
2. I have been working in the Home Services Program since about September 2009. I have provided care for the same client for the past two years. My client has been a joy to work for, and I like to think a lot of the care I provide for him is simply to be his hands. For example, I prepare meals, do light housekeeping, assist with toileting, bathing, dressing, I accompany him to medical appointments, help ensure that people understand what he is saying, run errands, do laundry, and help with his finances.
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 thought that the fair-share fees meant that I had joined the Union, which didn't bother me because I believe it is fair and that the Union is what won me my

benefits. 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 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 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 worked as a home care worker in Montana without a union, and we never even had a conversation about increasing our wages. Here, I know that the Union fights for us and has taught us how to fight for ourselves.

5. I believe I have benefited greatly from the training classes. I always learn something new, even when I'm retaking a class. Not only do I learn from the instructors, I also learn from the other home care workers participating in the class. The classes are also another opportunity for me to meet and commiserate with my fellow home care workers.

6. I believe another benefit to being a member of the Union is the political education, and the opportunity to become involved in local, state, and national politics. It has been very enlightening to learn and care more about issues like raising the minimum wage, and seeing how these issues affect all of us. The Union has given me the chance to have my voice be heard, and to let elected officials know that home care work is a real profession, and that we deserve to be taken as seriously as we take our work.

7. When I first started working in the Home Services Program I was not familiar with everything our Union does. However, I always knew that becoming a Union member was important. In about July of 2010, I attended a Union meeting where I officially signed a

membership card. Since I thought I had signed up to be a Union member when I first started in the Home Services Program, it didn't take much to convince me to sign, and I have remained a Union member ever since.

8. 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 represent me and they do not speak for me. The named plaintiffs seem to want something for nothing, even though they benefit from the wage increases and the health insurance won through the Union's negotiations with the State. I'm so sick and tired of people riding on others' coattails. It's only fair for everybody to contribute to something we all benefit from, I believe it is the right thing to do.

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

Executed this 5th day of Aug 2015.

Vanda G. Talkington
Vanda Talkington