

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 ROSEANNE TOWNSEND

Roseanne Townsend hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 62 years old and live in Blue Island, Illinois.
2. I have been working in the Home Services Program since about 2012. I have provided care for the same client since I started working in the program. The duties I perform range from meal preparation, dressing, bathing, laundry, light housekeeping, ensuring he takes his medication, to accompanying him to medical appointments.
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. In fact, when I filled out the paperwork to first become a home care worker in the Home Services Program, I saw the Union card and the Union pamphlet and after reading through what it meant to be a part of the Union, I signed the card to be a member. For some reason, I only paid fair-

share fees for the first four months until I went to my first class. 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 the Union is a great thing because I know that the Union fights for us even when we can't take the time off to attend the meetings. 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, up from a little over \$8/hour when I started. Also, the contract provides for the State to pay into a health benefits fund and for training. The paid training is really great, and I appreciate the chance to refresh my knowledge and to learn new skills. I also love that the Union keeps me abreast of important political issues of the day, and the opportunity the Union gives me to be involved. 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.

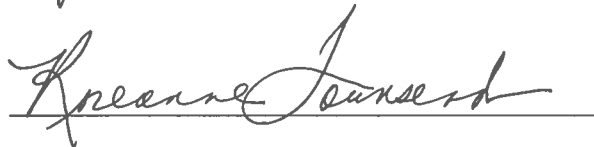
5. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. However, after I read the initial pamphlet, I knew I wanted to support the Union. In around November of 2012, I attended a class where a Union representative gave me a packet of information and another membership card. I told her I thought I had signed up already, but I filled out the form again just to be sure, and I have remained a Union member ever since, because I know that the Union is fighting for better wages and benefits that affect me.

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 was in disbelief when I first heard about this

lawsuit. I know that every home care worker had a choice to join the Union or not, and I always felt that I could freely choose to join the Union. The named plaintiffs don't speak for me, and I don't understand how someone can think that even though they didn't contribute anything towards the hard work the Union, they can still get all the benefits at the end of the day.

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

Executed this 30 day of July 2015.

A handwritten signature in cursive script, reading "Roseanne Townsend", written over a horizontal line.

Roseanne Townsend