

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 RAQUEL WARREN

Raquel Warren hereby declares as follows:

1. I am currently a home care worker for the Help at Home agency, and was a home care worker in the State of Illinois' Home Services Program from about June 2010 until about September 2010. I am 27 years old and live in Calumet City, Illinois.
2. When I worked in the Home Services Program I provided care for one consumer I was not related to.
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 didn't fully understand what the fees were for, but I spoke with a case manager in the Home Services Program who explained that they went to the Union. I had no objection to providing financial support for the Union, because 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. Before I became a home care worker, I was a hairstylist. I appreciated the wages I earned in the Home Services Program because they were consistent. I was also a student at the time in college, and the wages helped me pay for school supplies and the cost of transportation. 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. After September of 2010, I left the Home Services Program and began working as a home care worker for Help at Home. I noticed that fair share fees were being deducted from my Help at Home paycheck, and during our in-service training, Union representatives would talk about the benefits of being part of the Union. After I learned more about the Union, I decided to join the Union as a member through Help at Home in about April of 2012. I was never a member of the Union through the Home Services Program, but that wasn't because I was opposed to the Union. In fact, if it weren't for the fair share fees being deducted from my Home Services paycheck, I would not have been familiar with the Union when I got to Help at Home and saw the Union presentation at in-service training.

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 personally feel like every home care worker benefits from the Union contract, and that the Union is able to win those benefits because of the dues and fees that were paid. I believe that without the Union, what home care workers get paid would be left solely to the State and because the Union helps elevate the status of home care

workers in the eyes of elected officials, without the Union I don't believe the State would view home care workers as anything other than babysitters. If the named plaintiffs don't want to be associated with the Union at all, or if they don't want the benefits, that's fine for them. But, I don't believe it's fair that the named plaintiffs want to make it harder for other home care workers, who do need the health insurance and wage increases, by weakening 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 September 2015.



Raquel Warren