

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.

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DECLARATION OF THERESA WILLIAMS

Theresa Williams hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 51 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2010. I have provided care for my brother since I started in the Home Services Program.
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 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. Through the Union, home care workers' voices are heard, and without the Union it would be much harder for home care workers to win wage increases and benefits.

4. Our current Union contract provides for pay of \$13/hour for home care workers, a significant increase from when I first started. I have been able to buy a new car for the first time in my life that I'm paying for now, I have been able to redo my apartment, and provide for my grandchild and children better. I've also been able to use the wage increase to help me pay for things for my brother.

5. Our contract also provides for the State to pay into a health benefits fund and for training. Without the Union I would not have health insurance. The insurance has been a huge benefit. Before I got health insurance through the Union, I didn't go to the dentist and I had to go to a free clinic when I needed to go to the doctor. The clinics only do so much, and I have had to call really early in the morning to try to schedule an appointment with the Board of Health, which often took several months. With the insurance, I have been able to schedule appointments more easily, and know that I would be able to get the treatment I needed. 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. The training has been very helpful. I have learned something new in every class, and I believe the trainings classes are helpful for all home care workers to learn about the proper ways to do things. For example, I attended a class about depression that was helpful for both myself and my mental health, and also for helping me care for my brother better.

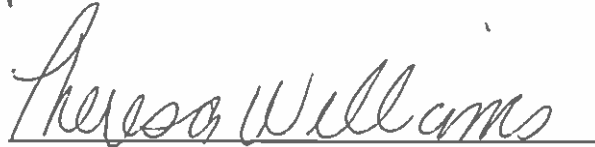
7. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. In about October of 2012 an organizer came out to my house to talk to me about joining the Union. The organizer explained to me how being a part of the Union has helped get wage increases and benefits, and how the Union helps home care workers voices be heard. She told me about how

there is strength in numbers, and when home care workers come together our voices will be heard. This really resonated with me and I signed a card to become a member on the spot and 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. I wouldn't want the fees I paid to the Union back. Even though I wasn't a member, still a Union organizer came out to talk to me, and I knew that the fees I paid were going to something good. I do not believe the named plaintiffs speak for me or represent me.

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 Sept 2015.

A handwritten signature in cursive script that reads "Theresa Williams". The signature is written in black ink and is positioned above a horizontal line.

Theresa Williams