## 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.

Defendants.

## **DECLARATION OF RAY LOFTON**

Judge: Honorable Manish S. Shah

Ray Lofton hereby declares as follows:

- 1. I am a home care worker in the State of Illinois' Home Services Program. I am 44 years old and live in Chicago, Illinois.
- 2. I have provided care for my brother for the last 11 years, and have been working in the Home Services Program since about 2008. The types of care I provide range from assisting with bathing, toileting, dressing, grooming, and feeding, to cooking, housework, laundry, shopping, and assisting with personal 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 had no objection to providing financial support for the Union. I believe the Union works for home care workers by advocating on our behalf during collective bargaining. I also believe that the Union advocates for consumers by making sure someone is

there to care for their needs. 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 remember when home care workers were making less than \$5 per hour. 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. 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 has helped professionalize home care, by advocating for wage increases and by offering training classes. I have found the training classes have been very useful. For example, without the Union it would be too expensive for me to continually renew my CPR certification, but since the classes offered by the Union are free to home care workers, I have been able to attend. I believe the classes make me a better home care worker.
- 6. I believe the Union helps give a voice to those who do not have much individual power. The Union keeps me informed about policies that affect me and my client, far more than I would have been if I were not part of the Union. In addition to giving me information, the Union also asks my opinion on different policies, which makes me more engaged in the political process. The Union has given me the opportunity to go to Springfield, IL to lobby our elected officials, not something I would have done if I were not a part of the Union.
- 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.

  However, in about May of 2011 an organizer asked if she could come to my house to talk to me

about the Union. After I learned more about the Union, I decided to join the Union as a member 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 do not believe the named plaintiffs represent me or speak for me. I have my own story and I want to be heard. I believe the Union supports all home care workers, and that it is unfair for the named plaintiffs to reap the benefits of the Union while wanting to make it harder for the Union to do its work.

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

Executed this 17 day of 2015.

Ray Lofton