

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 GRACE PASCHEL

Grace Paschel hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 42 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2014. I have provided care for the same client since I began working in the Home Services Program. The types of care I provide range from preparing meals, doing laundry, cleaning, grocery shopping, assisting with bathing, to assisting my client get around the house, accompanying her to medical appointments, and with medicine reminders.
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 the fees being deducted were Union dues, and I was proud because I thought it meant I was a member of the 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 there is strength in numbers, and that home care workers can achieve more when we fight together. I believe that with the Union, we can be better advocates for ourselves and our consumers. 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. I believe our dues are an investment in home care workers.

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 believe that the insurance has been a huge help to me. Because of the Union, I've been able to go to medical appointments, like physicals and mammograms, I've been avoiding for years because of the expense. I have been able to get the preventive care I need to stay healthy and to be there to care for my client.

5. I believe the classes have made me a better home care worker. I am grateful that I have been able to develop skills and learn new things, such as safe lifts. I have learned a great deal from my fellow home care workers and the trainers. I believe the training has helped me and my consumer become more informed so that we can develop a more professional relationship.

6. I believe the Union has given me great opportunities to learn more about policies that affect me and my client, and to participate in politics. My consumer and I have participated in some rallies together, and I believe that the Union has helped elevate the needs of home care workers and consumers in the eyes of the public and state and local politicians.

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. I

attended a training class in about May of 2014 where Latrell, a representative from the Union, gave a presentation about the benefits of being a part of the Union. As soon as I learned more about the Union, I decided to join as a member 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 do not believe the named plaintiffs speak for me or represent me. I believe that the named plaintiffs do not understand that the Union is fighting for them, and that the wage increases, benefits, and training that we've won are because of the Union's efforts. I believe we have a strong Union because we have invested in the Union and ourselves. I believe that it's unfair for the named plaintiffs to reap the benefits of the Union's work without contributing, or at least engaging with the Union to understand what the Union is about.

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

Executed this 23 day of Sept 2015.


Grace Paschel