

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>SUSAN HALLORAN, Plaintiff, v. AFSCME COUNCIL 5, et al., Defendants.</p>	<p>Case No. _____ HALLORAN DECLARATION</p>
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DECLARATION OF SUSAN HALLORAN

Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I began working at Inver Hills Community College in April 2018, initially due to a grant.
2. I do not recall any discussion of unions or my First Amendment rights vis-à-vis the union at new employee orientation, nor did I receive any printed information about my First Amendment rights to take home and read later.
3. My first position at the college was represented by the Minnesota Association of Professional Employees (MAPE), which I joined after being

asked by a friend. My membership in MAPE expired when I left that bargaining unit for a different job at the college.

4. On October 31, 2018, I changed jobs at the college and moved into the business office. AFSCME Council 5 is the exclusive representative for employees in that bargaining unit.
5. When I moved between jobs and between bargaining units, I received no verbal or printed information about my rights to join or not join the Union.
6. An AFSCME field representative, Mr. Matthew Schirber, visited me several months into my new job, saying it was just to introduce himself.
7. On April 15, 2019, I was engaged in a training session for my new position.
8. I was pulled out of the training midway through it because I was told Matthew Schirber wanted to see me.
9. Mr. Schirber told me that he had returned because he had failed to get me to sign the union authorization during our last meeting.
10. We walked into my office, and Mr. Schirber produced a tablet computer with Ms. Halloran's dues authorization pulled up. He said that all she needed to do was sign it.
11. As I signed it, I asked how much her dues would be. He replied that it would be a percentage of my income but he didn't know precisely.

12. I felt rushed and pressured and wanted to get him out of my office because the training instructor was waiting for me to return.

13. Our entire interaction was only a few minutes.

14. At no point in our conversation did Mr. Schirber did not provide me with any information about my *Janus* rights ion, nor did he provide her with her own physical or electronic copy of the dues authorization before, during, or after the visit.

15. The next day, April 16, 2019, I emailed Mr. Schirber to say that I had calculated the cost of the dues and looked at my income and expenses given my medical bills for cancer treatment, and I stated that I wanted to retract my registration. A true and correct copy of our email exchange is attached as Exhibit 1.

16. Mr. Schirber replied to me that I was bound to pay dues until my revocation period in one year. See Exhibit 1.

17. I sent a message to another AFSCME union representative that I know who was near retirement. He said he could not help me beyond referring me to the main AFSCME office. A true and correct copy of our email exchange is attached as Exhibit 2.

18. I sent a message to Mr. Schirber again and to the AFSCME main office and again received no help in retracting my authorization. A true and correct


copy of my emails is attached as Exhibits 3 (emails to Mr. Schirber) and 4 (email to AFSCME Council 5 and their response).

19. My lawyers at the Liberty Justice Center sent a letter to the college's administration on my behalf, and we received no response. A true and correct copy of that letter is attached as Exhibit 5.

20. In July, I told my supervisor in the business office about my attempts to resign, and she took my concerns on my behalf to the Director of Human Resources at the college. Human Resources talked to the new AFSCME Local President and was informed that the union insisted on my ability to resign only during the allotted window one year from the date of signing.

21. Inver Hills Community College has deducted union dues from my paychecks since April 2019.

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


Susan Halloran, declarant

Dated: September 13, 2019