

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 MINNIE BANDY

Minnie Bandy hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 53 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about late 2010. I have provided care for my sister since I started in the Home Services Program, and recently I've begun caring for another consumer I am 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 had no objection to providing financial support for the Union. I didn't know what the fair share fees were at the beginning, but once I learned what the fair fee was, I had no objection because I come from a union family. 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. I believe the Union is like an umbrella, with the Union, I always know that I have some protection for me and my fellow home care workers.

4. I made about \$10.65/hour when I first started in the Home Services Program. Our current Union contract provides for pay of \$13/hour for home care workers. I've been able to pay my bills on time because of the wage increases, and I've been able to make sure each of my eight grandchildren gets something special on their birthday. Now, I love my sister and I love caring for her, but it would be very difficult for me to provide the level of care and the number of hours of care for her if I was not getting paid as much as I am with the help of the Union.

5. Our union contract also provides for the State to pay into a health benefits fund and for training. I love the health insurance. I have appreciated being able to have a doctor, and know that I can make an appointment without worrying about not having to afford it. Without the Union I would not have health insurance. 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 Union makes sure that I am informed about the policies that affect my consumers and me, and gives me the opportunity to fight for myself and other home care workers. It has been so great to get to rally with thousands of other home care workers, and fight for fair wages and funding for our consumers' home care programs. I am a super leader because of the Union, and I would not have had the same opportunities to develop my skills without the Union. We are like the postman who comes everyday, we don't ever quit fighting.

7. With the skills I've learned from being a part of the Union I was able to open my own community center called A Step in a New Direction. Myra, Keith, and April from the

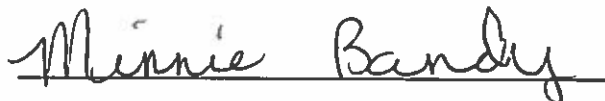
Union, and others, helped me a lot with the paperwork about how to apply for nonprofit status and also how to go about running an organization. The skills I've learned as leader in the Union have helped me organize volunteers, bring in donations, and develop programs. With the wage increases that the Union has won, I am able to help fund my own meal program at the community center.

8. Before I started working in the Home Services Program, I was a DHS child care provider and a member of the Union. However, I did not join the Union as a member through the Home Services Program until about May of 2011. I was invited to a meeting, and because I was already familiar with the Union's work and a big Union supporter, I signed a card to join as a member and have remained an active member ever since.

9. 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 everybody needs a union, regardless of whether or not they think they need wage increases or benefits. I believe the named plaintiffs do not fully understand all the work the Union does, or how important the Union's work has been to help lift home care workers out of poverty.

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 "Minnie Bandy". The signature is written in black ink and is positioned above a horizontal line.

Minnie Bandy