

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 ETHEL DEMARY

Ethel DeMary hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 56 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 the same client since I began working in the Home Services Program. The types of care I provide range from assistance with bathing, dressing, cleaning, preparing meals, grocery shopping and other errands, to accompanying her to medical appointments, medicine reminders and assisting her with treatment.
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. In previous jobs I've held, I've been a member of a

union and I believe that a union is important because it provides security and support for workers. 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, a significant increase from when I first started, 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.

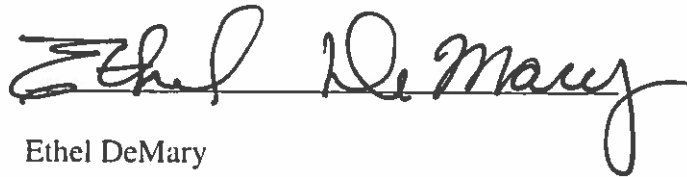
5. I believe the Union is important because the Union is there to assist home care workers. For example, once I had an issue with payment for attending a training class and I went to the Union for help and they helped me resolve the issue. I have attended all of the training classes and I believe they are very useful. I believe I have learned to be a better home care worker because of the classes, and am now better prepared to care for clients with different conditions. Not only do I learn from the instructors, but I also get the chance to learn from my fellow home care workers and their experiences.

6. 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 April of 2011, I attended a meeting and after I learned more about the Union and the benefits it provides, I decided to join as a member and have remained a Union member ever since.

7. 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 am grateful to the Union for advocating on behalf of home care workers and our consumers.

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

Executed this 25<sup>th</sup> day of Sept 2015.

  
Ethel DeMary