

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 ASHUNDA HARRIS

Ashunda Harris 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 been working in the Home Services Program since about July 2007. I provide care for my mother, and have provided care for her since I started working in the program. The tasks I perform range from bathing, grooming, cooking, light housekeeping and yard work, grocery shopping, accompanying her to appointments, to assisting her with 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 was happy to provide financial support for the Union. My father was a union man, my mother is a union woman, and I was an active member of the Chicago Teachers Union for many years before I became a home care worker, so I understood the importance of supporting 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 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. When I first started working in the Home Services Program, I earned around \$7/hour. 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 believe that the training classes have been essential for both the health and safety of the home care workers and our consumers. I believe the Union gives voice to the people, and having the chance to sit at the table to negotiate for what workers deserve has been very important to me. 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. The Union has given me an opportunity to be involved in supporting policies that help home care workers, child care workers, and our consumers. I have appreciated the chance to be a part of the Union's fight for justice by going to Springfield, IL, and Washington D.C. to let elected officials know how important our work is and how important our issues are.


5. 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. Around August 2011, a member volunteer knocked on my door, and we talked about what the Union does and the Union's plan for the future. After learning more about why the fees are being deducted, and about opportunities to become involved, I signed up on the spot and have been an active member ever since.

6. 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 am flabbergasted that the named plaintiffs are

asking for their fees to be returned after we have all benefitted from the work of the Union. I don't think it's right because everyone has seen their wages increase, and the chance to be a better caregiver to our consumers. I do not think that the named plaintiffs really understand the depth of all the work the Union does, for home care workers and consumers. I believe that the goal of the National Right to Work Legal Defense Fund is to take away the workers' voice, and I don't think that is right.

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

Executed this 4 day of Aug. 2015.

A handwritten signature in cursive script, appearing to read "Ashunda Harris", is written over a horizontal line.

Ashunda Harris