

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

THERESA RIFFEY, et al.,

Plaintiffs,

No.: 10-cv-02477

v.

Judge: Honorable Manish S. Shah

GOVERNOR BRUCE RAUNER,  
in his official capacity as Governor of  
the State of Illinois; and SEIU  
HEALTHCARE ILLINOIS & INDIANA,

Defendants.

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**DECLARATION OF CASSANDRA HENRY**

Cassandra Henry hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 47 years old and live in Chicago, Illinois.

2. I have been working in the Home Services Program since about 2011. I have provided care for nine or ten consumers during that time. I have provided care to consumers who were blind, paraplegic, who had brain damage, fibromyalgia, multiple sclerosis, and COPD. I do everything from run errands, clean, and cook, to provide attention and emotional support.

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. 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 work.

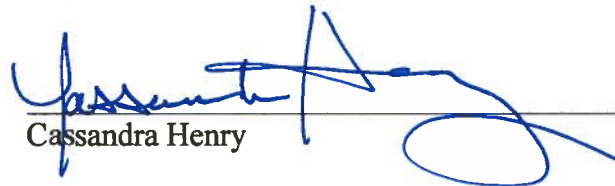
4. As I recall when I first started working in 2011 my hourly rate of pay was about \$11.25. Since then I have seen my wage rate increase to \$13/hour and for the State to pay into a health benefits fund and for training. I do not believe that home care workers would have achieved this without a strong Union or that we will be able to continue to improve the status of home care workers without a strong Union. Without a Union it would be extremely hard for us to make any improvements. I feel strongly that without the Union there may not be a Home Services Program and many of our consumers would be forced into nursing homes.

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. However, shortly after I started in 2011 I attended a training course came to present information on the Union. I signed up as member right then. I was thrilled to learn that I could be a Union member because I felt that I needed support on my job. I have seen so many people without a union representative work for years and have no protection on the job. Since 2011 I have remained a proud Union member and have occasionally worked to recruit other members. I have felt very satisfied that the Union supports me and has my interest in mind. I have also been very pleased with the seven or so training classes I have been able to take; they have benefitted me and improved the quality of care I provide to my consumers.

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 do not feel that the Plaintiffs represent my interests or the interests of any home care workers in Illinois. I don't believe the Union should have to pay return fees to anyone; I do not want the fees I paid returned to me. I feel that the Union used the money I paid to benefit me and all other home care workers.

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

Executed this 04 day of August 2015.

  
Cassandra Henry