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Sent via E-Mail [kpasulkabrown@getipass.com](mailto:kpasulkabrown@getipass.com)

March 20, 2024

Kathleen R. Pasulka-Brown  
Assistant Attorney General and  
General Counsel  
Illinois State Toll Highway Authority  
2700 Ogden Avenue  
Downers Grove, IL 60515

**RE: SEIU 73 Tollway Information Request**

Dear Ms. Pasulka-Brown;

SEIU Local 73 is requesting the following information. We believe that the information requested is essential to intelligently bargaining over the layoff proposed by the Tollway on Monday, March 18, 2024. Accordingly, we believe this information is necessary for us to proceed with bargaining the impact of Tollway's decision.

Did the Board and/or Executive Office approve the layoffs? Vote tabulation and response of each individual board member who voted to approve the layoffs;

Number of Phone calls that the call center received and out called per month for the years 2023 and 2024;

Number of incoming and outgoing calls handled by Lighthouse. Number of incoming and outgoing calls handled by Tollway employees;

Monthly average wait time for calls each month for 2023, 2024;

Number of employees at Lighthouse for each month in 2023 and 2024;

Total number of SEIU members in the Call center for each month in 2023 and 2024;

The total cost per employee from Lighthouse per month for the years 2023 and 2024;

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**Dian Palmer**  
President

**Joseph Richert**  
Secretary-Treasurer

**Jeffrey Howard**  
Executive Vice President

**Stacia Scott**  
Executive Vice President

**Roy Chavadiyil**  
Vice President

**Alan Jones**  
Vice President

**Alfred Rodriguez**  
Vice President

**Venus Roman-Valino**  
Vice President

**Lavitta "Vee" Steward**  
Vice President

The total cost of the Lighthouse contract for the years 2022, 2023, and 2024;

The Performance goals (Key Performance Indicator) for Lighthouse for each month of 2023 and 2024;

Results of Lighthouse meeting its monthly (KPI goals) in 2023 and 2024;

Total number of employees at Lighthouse who are visually impaired or need reasonable accommodations to complete job responsibilities;

The length of time each Lighthouse employee has been employed by Lighthouse and the amount of time they have worked on the Tollways account;

Number of Toll Collectors, Money Room workers, and Drivers employed by the Tollway in each month of 2023 and 2024;

The performance goals (KPI goals) for Tollway employees in each month of 2023 and 2024;

Results of Tollway employees meeting the monthly (KPI goal) goals for 2023 and 2024;

Number of customer complaints and determination if the complaint was a Tollway employee or Lighthouse employee;

Survey scores for Tollway employees;

Survey scores for Lighthouse employees;

Please provide this information in electronic form if possible. Please inform me if any of the above information cannot be provided and the reasons upon which you rely to withhold any material that I have requested. Also, provide me with the names and addresses of the officials to whom I may appeal such denial.

Please feel free to contact me directly with any clarifying questions or concerns.

Sincerely,



Joseph Richert  
Secretary-Treasurer  
SEIU Local 73

Cc: Dian Palmer  
Mark Bennett