Supreme Court of Ohio Clerk of Court - Filed March 10, 2015 - Case No. 2014-1267

IN THE OHIO SUPREME COURT

State of Ohio ex rel. STEVE R. MADDOX, *et al.*	:	
Relators,	:	
	:	CASE NO. 14-1267
v.	:	
THE VILLAGE OF LINCOLN HEIGHTS, OHIO, *et al.*	:	
Respondents.	:	

AFFIDAVIT OF SHARON WILLIS

STATE OF OHIO :
: SS:
COUNTY OF HAMILTON :

I, Sharon Willis, being first duly cautioned and sworn, state as follows:

1. I am over the age of 18, am competent to make this sworn statement, and have personal knowledge of all matters contained in this Affidavit.

2. I am currently employed as the Acting Finance Director for the Village of Lincoln Heights, Ohio ("the Village"). I have held this position since 2003. In this role, I am responsible for the Village's fiscal operating budget, controlling disbursements authorized from the Village treasury, and general payroll, accounting, and employee benefit matters. Before this role, from 1986 through 2003, I was employed by the Village of Lincoln Heights as an Accounting Clerk. As an Accounting Clerk, I was responsible accounts receivables, accounts payable, and had some participation in payroll matters.

3. Historically, and since at least 1986 when I began at the Village, the Village made its own independent, determinations as to how workers are classified and as to what classifications of workers are entitled to certain employee benefits—including the sick leave, holiday pay, fringe benefits, and Ohio Public Employees Retirement System (OPERS) benefits at issue in this case—pursuant to its own standards, policies, practices, discretionary decisions, and unique knowledge about certain positions and the Village. These determinations are not dependent, and have not been dependent, on separate designations or classifications made by other persons, entities, or governmental agencies.

Further, affiant sayeth naught.

Sharon Willis

Sworn to before me and subscribed in my presence this 10th day of March, 2015.

Notary Public

Ayrica Raglin
Notary Public State of Ohio
My Commission Expires 09-23-2018