

Affidavit #1 of Gloria Laurence  
Sworn: October 17, 2008

No. S08 5226  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BRITISH COLUMBIA TEACHERS' FEDERATION, FEDERATION OF POST  
SECONDARY EDUCATORS OF BRITISH COLUMBIA, BRITISH COLUMBIA DIVISION  
OF THE CANADIAN UNION OF PUBLIC EMPLOYEES, BRITISH COLUMBIA NURSES  
UNION, AND MARCIA TOMS

PLAINTIFFS

AND:

ATTORNEY GENERAL OF BRITISH COLUMBIA

DEFENDANT

**AFFIDAVIT #1 OF GLORIA LAURENCE**

I, Gloria Laurence, Special Education Assistant, of 16321- 13<sup>th</sup> Avenue, in the City of Surrey, in the Province of British Columbia, SOLEMNLY DO SWEAR AND SAY AS FOLLOWS:

1. I am a Special Education Assistant and a member of the British Columbia Division of the Canadian Union of Public Employees, Local 728 ("CUPE"), and as such I have personal knowledge of the facts and matters to which I have hereinafter deposed.
2. I am employed by Surrey School District #36 and have been so employed since 2001.
3. My employer is bound by a collective agreement with CUPE. The collective agreement provides that as a condition of continuing employment, all employees in the bargaining unit must be and remain members in good standing of CUPE. My membership in the CUPE arises solely from that provision.

4. The collective agreement between my employer and CUPE further provides for mandatory check-off of union dues. Under that provision, my employer deducts approximately \$35 per paycheque or approximately \$700 annually from my periodic paycheques and submits it to CUPE.
5. Pursuant to the collective agreement provisions set out in paragraphs 3 and 4 above, I have been a dues paying member of CUPE for approximately seven years. During this time, CUPE has engaged in advertising during election campaigns that has promoted and supported certain political views and parties. I also recall that during the last provincial election CUPE sent a mail-out to CUPE members about who to vote for in the provincial election. Circulars sent out by CUPE recently told us who they thought we should be voting for in the recent federal election.
6. I understand that this political advertising during election campaigns has been paid for by CUPE out of the membership dues received by it under the mandatory check-off provisions like the one in the collective agreement between my employer and CUPE, by which I am bound. CUPE has never sought my consent to the use of dues monies for political advertising purposes during election campaigns, and I do not consent to it doing so.
7. I recently learned that CUPE is challenging the constitutional validity of the cap on political advertising during election campaigns in the B.C. *Election Act* on the basis that it interferes with the freedom of speech, voting and freedom of association rights of union members. I am opposed to having the CUPE use my dues monies to advance a political agenda during an election campaign with which I do not agree. I believe that this infringes my freedom of speech, voting and freedom of association rights, because through my compelled membership in the Union, I am identified with and forced financially to support political views and parties that I do not support.
8. I have read the Statement of Claim filed July 23, 2008 in the within action and have now learned that CUPE says it spent \$198,000 on political advertising during the 88-day period preceding the British Columbia provincial election in 2005. I would not

voluntarily be a member of CUPE for political purposes. I do not need or want the Union to speak on my behalf or to use my dues monies to finance its political agenda during an election campaign.

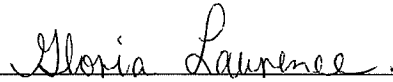
9. I support the legislation which prevents CUPE from spending more than \$150,000 in the campaign period as it is at least provides some limit on the amount of my dues money which can be spent for political purposes during an election campaign.

10. I make this Affidavit in support of a Motion to be added as a Defendant or Intervenor in the within constitutional challenge.

SWORN BEFORE ME at the City of )  
Surrey, in the Province Of British )  
Columbia, this 17<sup>th</sup> day Of October, 2008. )



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A Commissioner for Taking Affidavits For )  
British Columbia )



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**GLORIA LAURENCE**

**DALE R. DOAN**  
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