



# Foundation *Action*

The bi-monthly newsletter  
of the National Right to Work  
Legal Defense Foundation, Inc.

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## Homecare Providers Challenge SEIU 'Representation' in Court

***New legal challenge builds on Foundation's landmark 2014 Harris Supreme Court victory***

CHICAGO, IL – In 2014, The National Right to Work Foundation helped Pam Harris and her disabled son win a landmark Supreme Court victory outlawing forced union dues for home-based care providers. Now, Foundation staff attorneys are building on that decision to ensure that no caregiver can be forced to accept unwanted union “representation.”

With free legal assistance from the National Right to Work Foundation and the Illinois-based Liberty Justice Center, eight personal care and childcare providers have filed a lawsuit against the State of Illinois and the SEIU Health Care II union. The plaintiffs are challenging a law that grants SEIU officials exclusive “bargaining” powers with state government for thousands of Illinois caregivers – including many who never joined the union or oppose the union’s presence – over policies related to their homecare practices and the subsidy their clients receive for caregiving.

The plaintiffs’ legal challenge follows the Foundation’s recent *Harris v. Quinn* Supreme Court victory, which prohibited union officials from collecting mandatory dues from home-based caregivers. The reasoning of that decision also suggested that providers cannot be forced by state governments to accept union bargaining over their caregiving practices.

“Aggressive union organizers have imposed their agenda on homecare providers who have no interest in the



***Foundation staff attorney Bill Messenger (right) addresses the media after filing a lawsuit that challenges mandatory union representation for home-based caregivers.***

SEIU’s so-called ‘representation,’” said Patrick Semmens, vice president of the National Right to Work Foundation. “No caregiver should be forced to accept union bargaining against his or her will, which is why our staff attorneys are pursuing this vital legal challenge.”

### **Foundation responds to union homecare push**

The providers’ lawsuit contends that state law infringes on their First Amendment rights by forcing caregivers to associate with a union they do not wish to join or support. Union officials’ power to deal with the State of Illinois over caregiving practices also violates

the care providers’ right to freely petition their own government.

*See HOMECARE LAWSUIT page 8*

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## Supreme Court Case Challenging Public Sector Forced Dues Advances

**Stage set for legal showdown that could free all civil servants from mandatory union dues**

WASHINGTON, DC – In November, the United States Supreme Court announced it would hear oral argument on January 11 in a lawsuit brought by several independent-minded California teachers challenging the constitutionality of compulsory union fees.

Nearly 40 years ago, the Court ruled in *Abood v. Detroit Board of Education* that public-sector workers can be compelled to pay union fees as a condition of employment, but have a constitutional right not to pay for politics or any other activities unrelated to workplace bargaining. Since then, National Right to Work Foundation-assisted workers have repeatedly asked the courts to end government union officials' power to force public employees to pay any union dues at all.

In *Friedrichs v. California Teachers Association*, the case currently before the Court, the plaintiffs are challenging a state law that forces them to pay union dues to keep their jobs, despite the fact that they don't support the union.



**Pro-Big Labor politicians like California Attorney General Kamala Harris are scrambling to respond to a case that could end public sector forced union dues.**

### Teachers rely on Foundation precedent

The Supreme Court set oral argument in *Friedrichs* nearly four years to the day after it heard arguments in *Knox v. SEIU*, the first Foundation-won case that laid the groundwork for the teachers' current legal challenge.

During oral argument in *Knox*, Justice Anthony Kennedy asked a union lawyer whether civil servants should be required to opt out of paying for any union-boss politics, including the costs of monopoly bargaining, which Justice Kennedy called "a core political judgment."

"Justice Kennedy's question pointed out that everything a government-sector union does is political," National Right to Work Foundation President Mark Mix explained. "That makes it clear that forcing a civil servant to pay any dues or fees to a union violates his or her First Amendment rights."

In a victory for independent-minded workers, the *Knox* Court held that if union bosses wish to raise fees on non-members to subsidize a political campaign, they must obtain the affirmative consent of non-members to collect the new fees. Moreover, Justice Samuel Alito's opinion strongly suggested that it was time for the Court to reconsider whether forced unionism is compatible with the First Amendment.

Less than two years later, Foundation staff attorneys were back at the Supreme Court with the opportunity to raise that question in *Harris v. Quinn*. In *Harris*, the Court agreed with Foundation staff attorneys by ruling that individuals who receive state subsidies based on their clientele cannot be forced to pay union dues. A majority of the Justices further criticized *Abood's* allowance of any forced fees for public employees as "questionable on several grounds."

"Because the Foundation-assisted caregivers in *Harris* were not "true" state employees, the Court declined to issue a broader ruling protecting all civil servants' Right to Work," said Mix. "But legal observers and experts agreed that the Right to Work Foundation victory opened the door for such a challenge."

## Foundation Action

Rev. Fred Fowler  
Patrick Semmens  
Ray LaJeunesse, Jr.  
Mark Mix

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The Foundation is a nonprofit, charitable organization providing free legal aid to employees whose human or civil rights have been violated by abuses of compulsory unionism. All contributions to the Foundation are tax deductible under Section 501(c)(3) of the Internal Revenue Code.

# Invest in the Future of National Right to Work with a Planned Gift



*Because the National Right to Work Legal Defense and Education Foundation, Inc. is an IRS recognized charity, investing in the Foundation's fight against forced unionism can have tax advantages.*

*The beginning of a new year is the ideal time for you and your family to explore the many options available to strategically maximize your tax savings while providing a tax-deductible gift to support the Foundation's unparalleled legal aid program.*

## Gifts of Cash and Securities to National Right to Work

Gifts of cash are the most common method of making a charitable gift to the ongoing work of the Foundation. Cash gifts can reduce other regular or alternative minimum income taxes. Your savings depend on your tax rate and other factors.

A gift of stocks, mutual funds, or other securities that have increased in value since their purchase is another way to make a charitable gift to the Foundation today. Appreciated securities are subject to capital gains tax when they are sold, however donating appreciated holdings can eliminate or limit your exposure to capital gains taxes. For example, if you donate securities (held for more than one year), you may deduct the value of the securities totaling up to 30 percent of your AGI limit. (Please see the box below for instructions on how to give a tax-deductible gift of stock).

### Instructions for a Gift of Stock or Securities

Beneficiary:

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Foundation, Inc.

8001 Braddock Road, Suite 600, Springfield, VA  
22151

Receiving Bank: Merrill Lynch

Account Number: 86Q-04155

DTC Number: 5198

## Planned Gifts to Support the Fight Against Forced Unionism

In addition, now is the ideal time to review all of your estate plans – including a will or trust document – with your family and possibly include the Foundation in your legacy plans. Other Planned Giving options can include a charitable gift annuity (in certain states), a charitable remainder trust, a charitable lead trust, a life insurance policy, or an outright bequest to the Foundation. We encourage all of our generous supporters to review their estate plans today. It is vital for the peace of mind of you, your family, and the charities you choose to include in your estate plans!

Your continued partnership and investment in the fight against compulsory unionism abuse in the workplace is deeply appreciated. Your generosity to the Foundation goes a long way in assisting thousands of individual workers who have chosen to stand up and courageously fight back against Big Labor coercion.

We encourage you and your family to consult your own tax advisor or estate attorney and receive the peace of mind that you have properly provided a gift or a will or estate plan for your loved ones and the charities you support.

*If you have any questions, or need additional information about a planned gift to the National Right to Work Legal Defense Foundation, please contact Ginny Smith at 800-336-3600. Thank you in advance for your generosity and all the best for 2016!*



## Foundation Attorneys Help Michigan Employees Assert Their Right to Work

### *Teacher, pharmacist, GM automaker among Michigan workers turning to Right to Work Foundation*

MICHIGAN – Ron Conwell has taught computer science with the Clarkston Community Schools system since 2001. Since he was first hired, Conwell had been a full dues-paying member of the workplace union, Clarkston Education Association.

But in late August, Conwell resigned his union membership, as is his legal right. A short time later, the union sent Conwell a letter confirming his membership resignation, but also stating that he would still be required to pay an “agency fee” to the union if he wanted to keep his job.

Realizing his workplace rights had been violated, Conwell quickly turned to the National Right to Work Legal Defense Foundation for free legal assistance.

“Michigan’s public sector Right to Work law expressly prohibits forcing workers to pay union fees to keep their jobs, and it appears that union bosses in Clarkston have flat-out ignored the law,” said Mark Mix, president of the National Right to Work Foundation.

In November, National Right to Work Foundation staff attorneys filed unfair labor practice charges with the Michigan Employment Relations Commission to defend Conwell’s Right to Work without having to pay tribute to a union boss.

When Michigan became the 24th Right to Work state in 2012, many workers could no longer be forced to pay fees to a union to get or keep a job. However, the Michigan Right to Work laws grandfathered in union forced-fee agreements entered into before the laws went into effect.

The current monopoly bargaining agreement between the Clarkston School District and union was entered into in September 2015, more than two years after Michigan’s Right to Work law



**Foundation attorneys helped Michigan teacher Ron Conwell assert his workplace rights as part of a broader effort to enforce Michigan’s new Right to Work laws.**

took effect, and thus unlawfully contains a clause requiring union dues or fees as a condition of employment.

Union officials argue that there is a Memorandum of Agreement that was signed before the Right to Work law took effect that extends the forced-dues provision under which union bosses claim Conwell owes them part of his paycheck. However, even that memorandum expired in 2014.

A columnist from *The Detroit News* took note of this case and agreed that Conwell’s rights had been violated. Ingrid Jacques wrote: “Michigan’s unions need to learn the art of letting go. They don’t want to lose members, and that’s understandable. But under the state’s right-to-work law, employees have the option to leave their union without having to fear losing their job, too. At least that’s the way it’s supposed to work.”

Of course, Conwell’s case is not the first of its kind.

“When you consider that Foundation attorneys have now filed more than two dozen cases for workers to enforce Michigan’s Right to Work laws, it becomes clear that union bosses have no plans to give up their forced-dues powers without a fight,” added Mix.

### **Rite Aid pharmacist coerced into joining union**

One of those other two-dozen cases involves a pharmacist who decided to fight back against union boss intimidation.

Join or be fired. That was the message that Laura Fries, a certified Rite Aid pharmacy technician, received from a local union boss.

Fries works in Sturgis, Michigan, and was subjected to intimidation and harassment at the hands of union bosses, including the threat of losing her job, in November. She turned to the Foundation for free legal aid once she suspected that her rights had been violated.

With help from Foundation staff attorneys, Fries filed federal unfair labor practice charges with the National Labor Relations Board (NLRB) against the United Food and Commercial Workers International (UFCW) Local 951 union, with whom Rite Aid has a monopoly bargaining agreement.

The first incident occurred on November 2, 2015, when Fries was told by a union agent that she would be fired unless she joined Local 951. Because Local 951’s monopoly bargaining agreement was entered into before Michigan’s recently enacted Right to Work law took effect, Fries can be forced to pay an “agency fee” to Local 951, but federal law protects her right to refrain from full union membership and from paying for union political activity.

But after being confronted by the union representative and threatened with loss of her job, Fries signed the union membership and dues checkoff authorization forms under duress. She even added the phrase “did not want to join.”

Concerned by the confrontation, Fries called Local 951’s office later that day, and another union official informed her that she had been wrongfully told that union membership is required for employment. While Fries was no doubt relieved to hear that the first union agent had been wrong, she quickly realized that she was not free from Local 951’s harassment.

Over the phone, the union agent claimed that Fries would have to send a letter restating her desire to refrain from union membership (even though she’d written her objection on the original membership form), and informed Fries she owed back union dues from January 2015, when she started working at Rite Aid.

This phone call was the first time Fries had ever been told that she owed back dues.

The next day, Local 951 acknowledged receipt of Fries’ letter stating she had never wanted to join the union and wished to exercise the right to resign her union membership. However, Local 951 did not indicate (and, at the time of publication, still has not said) whether Fries’ resignation was accepted.

Local 951 also failed to provide any further information about what “back dues” Fries allegedly owed, and did not inform Fries how she could avoid paying for Local 951’s political and other non-bargaining activities, despite Local 951’s legal obligation to provide that information.

Rite Aid began deducting union dues from her paychecks in November. As of publication, union dues have continued to be deducted from Fries’ paychecks, despite the fact that she has stated verbally, and in writing, that she has no desire to join or support Local 951.



**Laura Fries, a Michigan pharmacist, also turned to Foundation staff attorneys for help when her workplace rights were violated.**

The NLRB’s office in Grand Rapids is currently investigating this case.

## **UAW and GM officials ignore Right to Work law**

Michigan is well-known for its auto industry, and, like other Michigan union officials, United Auto Workers (UAW) union bosses have obstructed workers who wish to exercise their new legal rights.

Daniel Lowery, who works at General Motors’ Lake Orion Assembly Plant, attempted to exercise his rights under Michigan’s private sector Right to Work law, only to have UAW Local 5960 union officials repeatedly ignore his requests to resign from the union and stop paying union dues.

In response, Foundation staff attorneys helped Lowery file unfair labor practice charges against the union and GM on the grounds that state and federal law allows Lowery to resign from the union and stop all dues and fees at any time, for any reason.

Lowery first submitted a written request to resign and stop paying union


dues in late August, but UAW officials denied this request. He tried again in late September, only to have UAW officials reject his resignation on technical grounds, claiming he did not include his signature, a witness’s signature, and his social security number.

He then submitted his resignation for a third time in October with the information union officials demanded, only to have UAW bosses continue to ignore Lowery’s resignation. Despite Lowery’s three separate resignation letters and his conversations with a UAW official about his desire to leave the union, Local 5960 still claims him as a full union member and GM continues to deduct full union dues from his paycheck while the NLRB investigates his charges.

## **Michigan task force defends Right to Work**

These employees’ experiences with union obstructionism highlight just how far union bosses will go to preserve their forced-dues funded empire. However, these cases are just the tip of the iceberg when it comes to union attempts to undermine Michigan’s status as a Right to Work state.

“All too predictably, union bosses have refused to respect Michigan workers’ newly-enshrined rights under the state’s Right to Work laws,” said Mix. “That’s why, immediately after passage of Michigan’s Right to Work laws, the Foundation established a task force with some of our most experienced litigators for the express purpose of aiding Michigan employees in enforcing their new rights and defending the state Right to Work laws from a barrage of union legal challenges.”

At last count, Foundation attorneys have over two dozen ongoing cases in Michigan, in addition to providing informal assistance to numerous other Michigan employees who wish to exercise their right to end dues payments to unions they do not support. 



## Foundation Helps Independent Workers Get Rid of Unwanted Unions

*Two cases highlight the barriers employees face when attempting to oust stubborn union bosses*

CHICAGO, IL and SANTA CRUZ, CA – In workplaces across the country, employees who wish to remove unwanted unions are faced with a startling array of bureaucratic and legal hurdles. Two recent cases out of California and Illinois highlight these barriers, as well as the measures Foundation staff attorneys are taking to help workers kick out stubborn union bosses.

In Santa Cruz, a group of Threshold Enterprises employees successfully voted to oust an unwanted Teamsters local, 269-195, in late November. Before they could vote, however, several independent-minded workers were subjected to intimidation, harassment, and abuse by unscrupulous union operatives. The employee who started the petition to get rid of the Teamsters also faced bureaucratic obstructionism at the hands of the National Labor Relations Board (NLRB).

Tomás Campos, a Threshold Enterprises employee who received free legal assistance from Right to Work staff attorneys, presented the NLRB with enough signatures from his coworkers in July 2015 to trigger a decertification election to remove the Teamsters. However, the NLRB initially rejected his petition because it wasn't submitted in English and Spanish, a requirement that is totally unsupported by the relevant case law. Only after Foundation staff attorneys intervened did NLRB officials relent and accept the petition.

"I do believe that the NLRB showed favoritism toward the union," said Campos. "They also said that the [decertification] petition had to be in Spanish as well [as in English] because most of the signatures were from people with Spanish first and last names, so they believed that people wouldn't be able to understand what the petition said only because they are Hispanic."



**Tomás Campos's struggle to remove one stubborn union is just the latest example of the NLRB's persistent pro-Big Labor bias.**

In November 2015, the NLRB finally decided to allow Campos and his coworkers to proceed with the decertification vote. In the interim, however, three other Threshold employees who opposed the union's presence were harassed and intimidated by militant Teamster goons. All three workers also say that other Threshold employees faced retaliation for opposing the union's presence. Foundation attorneys have since helped all three employees file unfair labor practice charges against the union.

Despite Teamster bosses' best efforts, Campos and his colleagues finally voted the union out on November 24, but union officials rarely give up their forced-dues privileges without a fight. Predictably enough, Teamster lawyers have already moved to nullify the election results. Campos and his Foundation-provided attorney are now fighting at the NLRB to uphold the vote to oust the Teamsters.

"Mr. Campos and his colleagues had to face down bureaucratic obstructionism and Teamster intimidation to get rid of one obstinate union," said Ray LaJeunesse, vice president of the National Right to Work Foundation. "Unfortunately, workers across the country face similar hurdles when attempting to remove unwanted union bosses."

### Chicago union uses similar obstructionist tactics

In Illinois, independent-minded employees are facing similar union and NLRB legal tactics. Thanks in part to Foundation staff attorneys, workers at a Chicago-based Arlington Metals facility did win a temporary victory against United Steelworker (USW) union bosses, who are attempting to overturn a 2014 decertification drive. Their victory could prove short-lived, however, as union lawyers have turned to the NLRB to reinstate their monopoly bargaining privileges.

In early December, a United States District Court judge denied a petition by the Obama NLRB and USW union lawyers to force the USW back into a Chicago workplace after a majority of employees decided to remove the union. National Right to Work Foundation staff attorneys represented Arlington Metals employee Brandon DeLaCruz and 20 of his co-workers in a federal court injunction hearing and filed a brief affirming the employees' opposition to the union's continued presence.

In September 2014, USW lawyers filed unfair labor practice charges with the NLRB in an attempt to nullify the employees' decertification drive and force the union back into their workplace. The full NLRB in Washington then authorized the filing of a petition

for an injunction to immediately reinstate union officials' workplace privileges.

If the federal judge had issued the NLRB's requested injunction, all Arlington Metals employees at the Franklin Park facility would have been immediately forced to accept unwanted Steelworkers "representation." Union officials would have been empowered to dictate workers' wages and working conditions, and likely would have demanded forced dues from all employees at the facility.

Although the employees' victory means that union bosses cannot immediately recover their workplace privileges, the NLRB can still nullify the decertification results by upholding the USW's original unfair labor practice charges.

"DeLaCruz and his coworkers may have survived one round, but union lawyers are already gearing up for the next one," continued LaJeunesse. "Union bosses can make use of a variety of bureaucratic and legal ploys to delay or even reverse worker decertification drives, and the Obama NLRB has embraced these dubious tactics."

## NLRB double standard traps workers in unions


When aggressive union organizers target a workplace, skeptical employees can't turn to the NLRB to delay or invalidate the unionization process. In fact, union operatives can make use of a number of favorable NLRB rules that facilitate their efforts, even if they face substantial employee opposition.

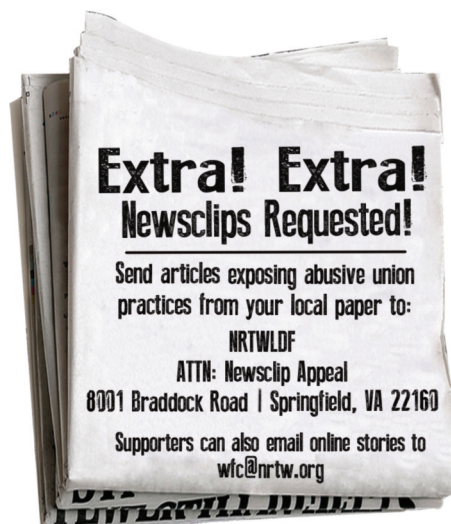
When workers try to remove an unwanted union, however, they have to jump through legal hoops at every turn. Even if they succeed, their decision can be delayed or overturned by savvy union lawyers, who know that a sympathetic Obama NLRB will consider even the most outlandish objections to employee decertification drives.



***The Obama NLRB continues to favor union bosses over the rights of independent-minded employees.***

Propping up an unwanted union has serious implications for employee rights. In all states, Right to Work and non-Right to Work alike, union bosses who retain their monopoly bargaining privileges can dictate terms and conditions of employment to any worker in a given bargaining unit, including those who oppose the union's presence. In non-Right to Work states, union officials are also empowered to collect dues from every employee, even those who don't support the union.

"Employees who wish to remove an unwanted union face an uphill battle, especially at this NLRB," said LaJeunesse. "However, our staff attorneys stand ready to help workers navigate the decertification process and reassert their workplace rights." 



## Supreme Court Case

*continued from page 2*

In September, Foundation staff attorneys filed an *amicus curiae* ("friend of the court") brief in *Friedrichs*, urging the Supreme Court to outlaw forced union dues in the public sector. However, pro-forced unionism politicians like California Attorney General Kamala Harris have also weighed in.


## "Usual suspects" defend forced dues in court

"The usual suspects have lined up to enthusiastically defend union bosses' forced-dues privileges," said Mix.

The Supreme Court agreed to divide the respondents' oral argument time between a California Teachers Association union lawyer and Harris, who also supports the union's position. Additionally, the Court agreed to give Barack Obama's Solicitor General ten minutes of argument time.

"Both Barack Obama and Kamala Harris have benefited from the very forced-dues system they are now defending at the Supreme Court," Mix noted. "In fact, Kamala Harris is now a candidate for U.S. Senate, and her campaign has received tens of thousands of dollars from union political action committees, including those affiliated with government-sector unions whose political clout depends upon their forced-dues powers."

Foundation staff attorneys have reviewed the briefs submitted to the Court by union lawyers and pro-forced-unionism politicians and believe the arguments by plaintiffs are stronger.

"I wouldn't dare to predict how the Supreme Court will rule, but whatever the outcome, the National Right to Work Foundation will not rest until every worker in America is no longer forced to pay any dues or fees to a labor organization," said Mix. 



## Homecare Lawsuit

continued from page 1

In recent years, union officials have stepped up their efforts to unionize unwilling home and childcare providers. In Illinois, former Governor Pat Quinn signed a 2009 executive order designating 4,500 individuals who offer in-home care to disabled persons as “public employees” solely for the purpose of unionization. Quinn’s executive order mirrored an earlier directive issued by disgraced former Governor Rod Blagojevich, which designated over 20,000 personal care providers as state workers for the purpose of forcing them into union ranks. That executive order was later codified under the state law that is now being challenged by the plaintiffs’ lawsuit.

National Right to Work staff attorneys are also helping home and childcare providers challenge similar schemes in Minnesota, Massachusetts, New York, Oregon, and Washington State. In Michigan, Foundation litigators are helping several homecare providers seek a court-ordered refund of millions of dollars in forced union dues for childcare providers who were pushed into union ranks.

“*Harris v. Quinn* was just the beginning,” continued Semmens. “Now that forced dues for caregivers have been outlawed, we intend to keep fighting until all homecare providers are free from mandatory union ‘representation’ they don’t want and never asked for. We hope this latest lawsuit will establish a precedent that can be used to push back against homecare unionization schemes across the country.”

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and other Right to  
Work updates, visit  
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## Message from Mark Mix

President  
National Right to Work  
Legal Defense Foundation

Dear Foundation Supporter:

It was the shot heard ‘round the legal world.

One left-wing law professor wrote that Justice Samuel Alito’s majority opinion in *Knox v. SEIU* in 2012, won by National Right to Work Foundation staff attorneys, represented the Supreme Court’s “Scott Walker moment.”

Justice Alito’s opinion pointed out that prior Supreme Court decisions “have substantially impinged upon the First Amendment rights” of independent workers who exercise their right to refrain from union membership.

Union lawyers and their apologists in academia were horrified that the Supreme Court had the audacity to suggest that forcing civil servants to pay dues or fees to unions might run afoul of the First Amendment – and feared that Foundation staff attorneys would raise this question at the next opportunity.

As you may remember, Foundation staff attorneys did just that two years later in the *Harris v. Quinn* case. While the Court freed in-home healthcare providers from being forced to subsidize union bosses, it declined to issue a broader ruling protecting the Right to Work for all civil servants.

As you’ll read in this issue of **Foundation Action**, the nine black-robed justices are again considering the question and could decide to protect every civil servant in America from forced unionism.

Make no mistake, such a possibility was unthinkable just a decade ago.

While the New Year is a time for optimism, we must not lose sight of the continued challenges we face. Other articles in this issue address some of the persistent challenges independent-minded workers face when they attempt to exercise their rights.

The dedicated support of concerned citizens like you has brought us this far. Your generosity also enables Foundation staff attorneys to fight in the trenches day-in and day-out against union and government lawyers who stand in the way of worker freedom.

You never know which Foundation-supported case will provide the next shot heard ‘round the world.

Sincerely,

Mark Mix