



Foundation Action

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

Vol. XXXIV, No. 1

8001 Braddock Road • Springfield, Virginia 22160

www.nrtw.org

January/February 2014

Supreme Court to Hear Challenge to Homecare Unionization Scheme

Latest Foundation case has the potential to end forced dues for all government employees

WASHINGTON, DC – This October, the United States Supreme Court announced that it would hear arguments in *Harris v. Quinn*, a case that challenges the forced unionization of personal homecare providers in Illinois. Following the National Right to Work Foundation’s landmark Supreme Court victory in *Knox vs. SEIU* and oral arguments in *Mulhall v. UNITE HERE*, *Harris* will be the seventeenth case Foundation attorneys have argued before the Supreme Court.

The *Harris* case challenges a scheme pioneered by disgraced former Illinois Governor Rod Blagojevich and expanded by his successor, Governor Pat Quinn. Under executive orders signed by both governors, personal homecare workers were designated as “public employees” for the purpose of union organizing, a move that has since forced thousands of unwilling care providers into the SEIU’s forced dues-paying ranks.

Thousands of home care workers are already forced to pay union dues to the Service Employees International Union (SEIU). Meanwhile, SEIU and American Federation of State, County, and Municipal Employees (AFSCME) union bosses are now competing to acquire monopoly bargaining control over thousands more Illinois homecare providers.

With the help of Foundation staff attorneys, Pam Harris and seven other Illinois homecare providers – several of



Pam Harris’s fight to care for her developmentally-disabled son without union-boss interference has finally reached the Supreme Court.

whom have already been unionized – are challenging the Governors’ executive orders on the grounds that forcing them to affiliate with a union and subsidize union activities violates their rights to free expression and association.

Case could set broad precedent against forced unionism

“I have been motivated not only out of [the] need to protect my family but by other families similarly situated,” explained Pam Harris, lead plaintiff in the case.

“I am doing what needs to be done to protect the support our significantly disabled sons and daughters need to live at home surrounded by their family.”

According to Right to Work staff attorneys, the *Harris* case is an opportunity to build on earlier Foundation-won

See FOUNDATION SUPREME COURT CASE page 2

IN THIS ISSUE

- 3 Labor Bosses Face Foundation Charges for Violating Michigan Right to Work Laws
- 4 Supreme Court Dismisses Union Effort to Overturn Organizing Precedent
- 5 Foundation Campaign Educates Illinois Teachers About Workplace Rights
- 6 Foundation-Assisted Wisconsin Civil Servants Fight for Act 10 Protections
- 7 Former Nurse Files Brief in NLRB “Recess Appointment” Supreme Court Case

Foundation Supreme Court Case Takes on Homecare Forced Unionization

continued from page 1

precedents to limit union officials' special privileges.

If the Supreme Court rules that Blagojevich's homecare forced unionization scheme violates Illinois homecare providers' First Amendment rights, Foundation attorneys could seize on that precedent to challenge similar organizing schemes in over a dozen states, including Rhode Island and Minnesota.

"Workers in many industries that have traditionally had a strong union presence have been turned off by Big Labor's political activism and counter-productive organizing tactics," said Mark Mix, President of the National Right to Work Foundation. "That's why union organizers have turned to political schemes like Illinois homecare unionization."

"Union bosses want more forced dues, but they can't rely on voluntary employee support, so they've used executive and legislative power grabs to force homecare providers into union ranks."

Right to Work attorneys are also asking the Court to expand on the ruling it



Disgraced former Illinois Governor Rod Blagojevich pioneered the homecare forced unionization scheme Foundation attorneys are challenging at the Supreme Court.

issued last summer in the Foundation's landmark *Knox v. SEIU* victory. In *Knox*, Justice Alito's majority opinion hinted that the Court might be willing to repeal union bosses' forced dues powers over public sector workers. With *Harris*, the

nine justices may reconsider whether union officials should have any power to extract forced dues from public employees.

"The *Harris* case could do more than stem the tide of homecare unionization schemes in places like Minnesota, Illinois, and Rhode Island," said Mix. "In fact, *Harris* has the potential to eliminate union bosses' forced dues powers in the public sector for good."

Illinois homecare providers still stuck in legal limbo

Unfortunately, Pam Harris and thousands of other Illinois homecare providers – many of whom have already been forced into union ranks – remain in legal limbo until the Supreme Court issues a final ruling. Meanwhile, aggressive union organizers are moving forward with similar homecare organizing campaigns in Minnesota and Rhode Island.

Harris hopes that her stand will encourage other parents and homecare providers facing aggressive union organizing campaigns to stand up for their rights.

"I am simply a mom who lives in northern Illinois who connected with others in the same situation," said Harris. "I firmly believe that every family, given accurate and complete information, will make the right choice. It's daunting to publicly oppose unionization. But if it's the right thing for you - don't be afraid."

"We hope the Supreme Court will take this opportunity to strike a decisive blow against forced unionism in the public sector," continued Mix. "No homecare provider or civil servant should be forced to pay union dues, which is why the outcome of the *Harris* case is so vital." 

Foundation Action

Rev. Fred Fowler	Chairman, Board of Trustees
Patrick Semmens	Vice President and Editor-in-Chief
Ray LaJeunesse, Jr.	Vice President and Legal Director
Mark Mix	President

Distributed by the
National Right to Work Legal Defense Foundation, Inc.
 8001 Braddock Road, Springfield, Virginia 22160
www.nrtw.org • 1-800-336-3600

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.

Labor Bosses Face Foundation Charges for Violating Michigan Right to Work Laws

Union officials stonewall workers' attempts to resign from union, stop paying full dues

DETROIT, MI – With free legal assistance from National Right to Work Foundation staff attorneys, several Michigan workers have challenged union bosses' attempts to prevent them from exercising their rights under Michigan's recently-enacted Right to Work laws.

Under Michigan's Right to Work law, contracts entered into after the law went into effect in March 2013 must respect workers' rights to refrain from membership in the union and the payment of any union dues or fees.

However, in cases across the state, union officials are attempting to force workers to abide by union bylaws and "window periods" in order stifle workers seeking to resign union membership and/or refrain from union dues payments.

UPS worker files federal charge

In late September, a Wyoming, Michigan UPS employee became the first worker to file a legal challenge against union officials for violating the new private-sector Right to Work law.

Gary Frost, who is not a member of the Teamster Local 406 union, had to pay union fees as a condition of his employment before Michigan enacted Right to Work laws making union payments completely voluntary. Once Michigan's Right to Work laws went into effect, Frost, out of an abundance of caution, attempted to comply with Local 406's procedure to end forced dues payments by revoking his dues deduction authorization – a document union officials use to take dues or fees from workers' paychecks.

Instead of complying with Frost's request, Local 406 union officials told him that he would have to wait for a



Unscrupulous union bosses are attempting to bypass Michigan's newly-enacted Right to Work law.

union-designated "window period" before he could revoke his dues deduction and opt out of union fees. Union officials have also refused to provide Frost with a copy of his dues deduction authorization and have not told him of the dates of the so-called "window period" for revocation.

With the help of Foundation attorneys, Frost filed a federal charge with the National Labor Relations Board (NLRB) against the Teamster local for violating his rights.

Three school workers file state charges

In the following weeks, National Right to Work Foundation staff attorneys helped three Michigan public school employees file state charges with the Michigan Employment Relations Commission (MERC) in Detroit. The employees' charges seek enforcement of Michigan's public-sector Right to Work law.

In all three cases, the public-sector workers informed union officials that they were exercising their right under Michigan's Right to Work law to refrain from union membership and dues payments after the union's monopoly bargaining agreement with their employers expired. Instead of complying with the workers' requests, union officials told the workers that they would have to wait for union-designated "window periods" forcing the school workers to remain union members and pay union dues for almost an additional year.

Teamster Local 214 union officials told one school employee that she would have to wait until July 2014 before she could exercise her right to refrain from union membership and dues payments. Michigan Education Association (MEA) union officials told the other workers that they would have to wait for a brief, union-designated "window period" in August before they could resign union membership and refrain from paying union dues.

The workers' charges point out that Michigan's Right to Work law protects their unequivocal right to refrain from union membership and dues payments at any time.

The MERC has thus far scheduled hearings in at least two of the public-workers' cases. The outcomes of these cases could very well determine how strictly Michigan's Right to Work law is enforced.

"Union officials are trying to keep workers from exercising their rights under Michigan's Right to Work laws," said Ray LaJeunesse, Vice President of the National Right to Work Foundation. "The MERC needs to declare that unscrupulous union officials' efforts to undermine workers' rights enshrined in Michigan's new Right to Work law will not be tolerated." 

Supreme Court Dismisses Union Effort to Overturn Organizing Precedent

Right to Work-won Appeals Court ruling stands, limiting backroom union card check deals

WASHINGTON, DC – In December, the United States Supreme Court "dismissed as improvidently granted" a union appeal of the Eleventh Circuit Court of Appeals' ruling in *Mulhall v. UNITE HERE*. Although the Court heard oral arguments from both the union and Foundation staff attorneys, it declined to issue a ruling.

By allowing the Eleventh Circuit ruling to stand, the Supreme Court left in place an important check on aggressive union organizing pacts that undermine workers' rights.

Mulhall v. UNITE HERE marks the sixteenth time Foundation attorneys have argued before the highest court in the land. Martin Mulhall, the lead plaintiff, has received free legal assistance from the National Right to Work Foundation since 2008.

According to Harvard Law Professor Jack Goldsmith, ". . . [A]s long as [the] decision stands, the specter of expensive and difficult litigation will hover over neutrality/bargaining agreements in many circuits, and will indeed chill the making of those agreements."

Shady organizing pact sparks legal action

In 2004, UNITE HERE Local 355 and Mulhall's employer, Mardi Gras Gaming, agreed to a backroom organizing deal. Under the terms of the agreement, union officials spent over \$100,000 to pass a gambling ballot initiative and guaranteed not to picket, boycott, or strike against Mardi Gras facilities.

In return, Mardi Gras agreed to give union operatives employees' personal contact information (including home addresses), grant access to company facilities during a coercive "card check" organizing campaign, refrain from



Martin Mulhall (left) and Bill Messenger, a Foundation staff attorney, address the media at the Supreme Court. The precedent Mulhall won at the Eleventh Circuit provides an important check on backroom union card check deals.

informing workers about the downsides of unionization, and refrain from requesting a federally-supervised secret ballot election to determine whether employees unionized.

With the help of Foundation staff attorneys, Mulhall filed a lawsuit challenging this organizing pact in 2008. Under the Labor Management Relations Act, employers are prohibited from handing over "any money or other thing of value" to union organizers, a provision that is supposed to prevent union officials from selling out workers' rights in exchange for corporate concessions. Mulhall argued that the company's concessions were of substantial monetary value because they made UNITE HERE's organizing drive easier and less expensive.

Mulhall won a significant victory last spring, when the Eleventh Circuit Court of Appeals ruled that the company's

organizing assistance could constitute "a thing of value." UNITE HERE lawyers quickly appealed the decision to the Supreme Court, prompting Foundation attorneys to file a cross-petition asking the Court to review certain aspects of the Eleventh Circuit's ruling.

Backroom organizing deals undermine workers' rights

Without prohibitions on employers handing over things of value to union organizers – including workers' personal information – unscrupulous employers and aggressive union organizers will continue to agree to backroom deals that undermine worker rights.

Even some of the Court's more liberal justices expressed skepticism about the legality of the union's organizing pact during oral arguments.

“That [\$]100,000 is troubling to me because I think what the circuit was saying is if the [\$]100,000 bought the peaceful recognition provisions, then that’s corrupt, and that is outside the exemptions that the law provides,” said Justice Sotomayor.

“Tell me why I’m wrong about that and tell me how I deal with that niggling problem I have about the \$100,000, because it does feel like a bribe to the employer,” she continued.

Meanwhile, Chief Justice Roberts zeroed in on the union’s use of a card check drive to organize Mardi Gras workers.

A card check deal between an employer and a union “taints that process,” said Roberts, “in particular by allowing the card check procedure that it has been argued exercised coercion against employees to support the union.”

Card check drives are often agreed to as part of the backroom union organizing deals Mulhall challenged. In exchange for union concessions over pay scales and working conditions, many companies will allow union organizers to conduct a coercive card check organizing campaign. Some employers will even hand over employees’ home addresses and personal contact information to union operatives.

Armed with employees’ addresses and phone numbers, union organizers browbeat, harass, and intimidate workers into signing cards that are then counted as “votes” for unionization. Once the cards are tallied, union officials are able to collect forced dues from the workers in non-Right to Work states while employers get to deal with a pliant union whenever disputes about wages or working conditions arise.

Although the Supreme Court declined to issue a broader ruling, the Eleventh Circuit’s *Mulhall* decision established an important limit on backroom organizing deals between union operatives and employers.

“We’re happy to report that the Eleventh Circuit’s ruling will stand, limiting the potential for backroom deals between union organizers and company officials,” said Mark Mix, President of the National Right to Work Foundation. “Management shouldn’t be allowed to turn over employees’ personal information to Big Labor organizers, which is why the Eleventh Circuit’s precedent is a vital protection for workers.”

“Union bosses and employers who use workers’ rights as a bargaining chip will now enter into these so-called neutrality organizing agreements at their own risk.” 

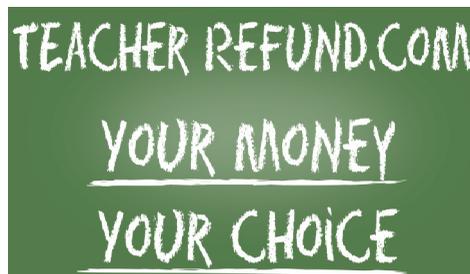
Foundation Campaign Educates Illinois Teachers about Workplace Rights

Teacher refund project aims to break the union boss stranglehold on Illinois public schools

SPRINGFIELD, VA – In November, the National Right to Work Foundation officially launched a multimedia campaign to educate Illinois teachers about their workplace rights. The campaign is aimed at informing public school teachers that they can resign from a union and opt out of dues spent on union politics at any time.

“Although teachers have the right to refrain from union membership and the payment of dues for things like union politics, many educators remain unaware of these rights,” said Patrick Semmens, Vice President of the National Right to Work Foundation. “We hope to remedy that problem by reaching out to Illinois teachers.”

The teacher refund project features an extensive radio campaign broadcasted throughout Illinois. The radio public service announcements inform teachers of their rights and direct them to teacherrefund.com, a Foundation site



that provides further information and a step-by-step guide to resigning from a teacher union and opting out of dues unrelated to workplace bargaining.

In Illinois and other states without Right to Work laws, employees – including public school teachers – can be forced to pay union dues just to keep a job. However, workers still have the right to refrain from formal union membership and the payment of dues for activities unrelated to workplace bargaining, such as union political activism.

Unfortunately, many Illinois teachers are unaware of their workplace rights.

Union officials rarely advertise that union membership and the payment of full dues are optional, and in some cases, actively obstruct teachers who wish to leave a union.

However, the recent passage of Right to Work laws in neighboring Michigan and Indiana and Wisconsin’s recent reform of its public-sector labor laws have shined a spotlight on worker rights in the Midwest. The Illinois teacher refund campaign seeks to capitalize on this momentum by encouraging Illinois teachers to learn about and exercise their right to stop paying dues for things like union politics.

“Foundation attorneys are prepared to assist any Illinois teachers who wish to assert their workplace rights,” continued Semmens. “However, teachers need to be made aware of those rights before we can help, which is why the National Right to Work Foundation launched this educational campaign.” 

Foundation-Assisted Wisconsin Civil Servants Fight for Act 10 Protections

Teachers stop union officials from bypassing recertification elections guaranteed under law

WAUKESHA, WI – National Right to Work Foundation staff attorneys are part of a statewide effort to help Wisconsin public servants and a Wisconsin taxpayer defend Governor Scott Walker's government-sector unionism reforms, commonly known as Act 10.

In 2011, Walker pushed for passage of Act 10 in a contentious legislative session that was highlighted by union militants' acrimonious protests, which led to violence, arrests, and vandalism.

Among other measures, Wisconsin Act 10 prevents government union officials from forcing nonmember workers to pay any union dues or fees, restricts union monopoly bargaining, ends the use of taxpayer-funded payroll systems for the collection of union dues, and guarantees that public workers can vote on their union representation yearly.

Union bosses attempted to halt recertification votes

After losing the legislative fight, union bosses immediately challenged Act 10 in the courts. Although government union lawyers have lost all of their challenges to Act 10 in the federal courts, Dane County Circuit Court Judge Juan Colas sided with union lawyers and struck down the law (Significantly, another Dane County Circuit Judge later upheld the law). The state court of appeals did not rule on Colas' decision because of its limited effect, and certified the state's appeal to the Wisconsin Supreme Court.

Despite the appeals court's limited interpretation of Colas' ruling, union officials seized on it to win an order from Colas to prohibit the Wisconsin Employment Relations Commission (WERC) from conducting the statewide secret-ballot recertification elections guaranteed under Wisconsin Act 10.



Former Kenosha teacher Kristi Lacroix is challenging a new union bargaining agreement that forces teachers to pay union dues.

Once the case reached the Wisconsin Supreme Court, five Wisconsin public school teachers from across the state filed court briefs with the help of attorneys from the National Right to Work Foundation and the Wisconsin Institute for Law and Liberty, asking the court to overturn Colas' ruling and allow the recertification elections to proceed.

Additional lawsuits seek to uphold Act 10 provisions

The same five Wisconsin public school teachers also filed a lawsuit in the Waukesha County Circuit Court against the WERC for refusing to allow the secret-ballot recertification elections.

Alternatively, the teachers asked that, if the court does not declare that WERC must hold the recertification elections, then the teachers should be granted their right to represent themselves individually regarding the terms and conditions of their employment.

Meanwhile, a Kenosha public school teacher and a Kenosha taxpayer also filed a lawsuit in state court challenging

a new monopoly bargaining agreement between the Kenosha Unified School District, the District's Board of Education, and the Kenosha Education Association union because it violates several provisions of Wisconsin Act 10.

With free legal assistance from the National Right to Work Legal Defense Foundation and the Wisconsin Institute for Law and Liberty, Kristi Lacroix and another Kenosha teacher are challenging a monopoly bargaining agreement that forces teachers who refrain from union membership to pay dues as a condition of their employment using taxpayer-funded payroll systems. The new monopoly bargaining agreement also negotiates teachers' pay, benefits, and working conditions outside of the scope allowed under Act 10.

Recertification elections restarted after ruling

After the Wisconsin Supreme Court heard arguments on the appeal of Colas' ruling, the court issued a ruling vacating Colas' order prohibiting the WERC from conducting recertification elections.

Although Wisconsin civil servants may have to wait until June to receive the Wisconsin Supreme Court's final ruling on Act 10, they will at least be able to vote to determine whether union officials can continue to claim to represent them in their respective workplaces.

"Many independent-minded civil servants have no interest in associating with government sector unions and they deserve to have their voices heard," said Patrick Semmens, Vice President of the National Right to Work Foundation. "Act 10 protects those workers' right to do so and now Wisconsin civil servants will be allowed to participate in the elections that they were promised." 

Former Nurse Files Brief in NLRB “Recess Appointment” Supreme Court Case

Biased labor board has ignored Supreme Court’s restrictions on union bosses’ forced dues powers

WASHINGTON, DC – A former Warwick, Rhode Island nurse has filed a brief with the U.S. Supreme Court in the high-profile legal battle over President Barack Obama’s purported “recess appointments” to the National Labor Relations Board (NLRB).

Jeanette Geary filed the *amicus* brief with free legal assistance from National Right to Work Foundation staff attorneys after the invalid Obama NLRB eviscerated the Court’s restrictions on union bosses’ power to force nonmembers to pay union dues used for union political activities.

Appeals Court says recess appointments unconstitutional

The current case, called *Noel Canning v. NLRB*, is on appeal after the U.S.



President Obama’s unconstitutional “recess” appointments face a tough test at the Supreme Court in January.

Court of Appeals for the District of Columbia Circuit agreed with Foundation attorneys’ arguments and held that President Obama’s recess appointments were unconstitutional. A three judge panel on the appeals court ruled that Obama violated Article II of the U.S. Constitution, which requires the President to obtain the advice and consent of the U.S. Senate for appoint-

ments to the most powerful positions in the executive branch.

In Geary’s latest brief, Foundation staff attorneys argue that modern technology has reduced the need for recess appointments, which originally were intended for when a vacancy arose while Congress was unavailable for extended periods of time. Foundation attorneys point out that modern communications technology and air travel allow Congress to consider a President’s nominees at almost any time, regardless of the Senators’ geographic dispersal.

If Foundation attorneys’ argument that Obama’s NLRB appointments are unconstitutional prevails at the High Court, then the Board had only two valid members and lacked the quorum it needed from April 2011 to August 2013 to enact rules or enforce federal labor law. Such a decision would overturn the lawless ruling in Geary’s case.

See RECESS APPOINTMENTS page 8

Make a Planned Gift Now: Invest in the Future of Right to Work



As we look ahead to more economic uncertainty and tax policy changes in 2014, we are reminded that many of our National Right to Work Foundation donors are considering tax-saving options for the future.

Reviewing your estate plans at this time is crucial for economic security for you and your loved ones. There remain, however, many options available for you to take advantage of making a charitable gift now – or in the future – to assist the work of the Foundation.

Gifts of cash are the most common method of making a charitable gift to the Foundation. Gifts of cash can reduce either 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 they were purchased is another way to make a charitable gift to the Foundation today. Appreciated securities are subject to a capital gains tax when they are sold. Gifts of appreciated stock (held for more than one year) may be deducted in amounts totaling up to 30 percent of your AGI limit.

Consider a long-term gift

Now may be an ideal time to review your will and estate plans and include the Foundation through a charitable gift annuity, charitable remainder trust, charitable lead trust, or outright bequest. We encourage all of our supporters to review your plan of action to provide for you and your loved ones, as

well as your favorite charity, like the National Right to Work Legal Defense and Education Foundation, Inc.

Your continued investment in the National Right to Work Foundation allows us to take on compulsory unionism in the workplace. Your generosity goes a long way toward assisting thousands of workers across the country to stand up and combat union coercive power through the courts.

Of course, we urge you to consult your own tax advisor or estate attorney when considering a long-term planned gift to the Foundation. If you have any questions or need further information, please contact Ginny Smith at 1-800-336-3600. Thank you for your continued support and generosity.

Recess Appointments

continued from page 7

Geary had also previously challenged the so-called recess appointments in her own case after she experienced firsthand the disastrous consequences of Obama's invalid NLRB.

Union boss political dues scheme would be overturned

Geary's case stems from an unfair labor practice charge she filed in 2009 with the NLRB against the United Nurses and Allied Professionals (UNAP) Local 5008 union for illegally forcing her and other employees to pay for the union's political lobbying, or lose their jobs.

In 2012, the rogue Obama NLRB issued a stunning decision – flying in the face of long-standing, Foundation-won Supreme Court precedent – that granted union bosses the power to charge the nonmember nurses for union political lobbying, including political lobbying in other states. Geary's case is still pending and further appeals are planned once the recess appointment case is resolved.

“Jeanette Geary's case is just the latest example of the Obama NLRB's consistent pro-Big Labor bias,” said Ray LeJeunesse, Vice President of the National Right to Work Foundation. “Now, the NLRB must finally justify why it continued to operate despite the appeals court's finding that President Obama's ‘recess’ appointments are constitutionally invalid.”

“We hope the Supreme Court will overturn the President's illegal actions and restore the proper balance of power as prescribed in the U.S. Constitution,” added LaJeunesse. “Such a ruling would also overturn the NLRB's blatant move to expand union boss political forced-dues powers at workers' expense.”



Message from Mark Mix

President
National Right to Work
Legal Defense Foundation

Dear Foundation Supporter:

Workers, who hail from all walks of life, are the lifeblood of the National Right to Work Foundation's strategic litigation program.

Yet, after the U.S. Supreme Court surprised legal observers and dismissed a union appeal of the Eleventh Circuit Court of Appeals' ruling in *Mulhall v. UNITE HERE* (See Page 4), a UNITE HERE union spokeswoman told the Washington Examiner:

“That should put an end to the National Right to Work Foundation's project of finding employees to front for its attacks on these agreements.”

Actually, this is just the beginning.

The Supreme Court's latest move should serve as encouragement to the hundreds of courageous workers who reach out to National Right to Work Foundation staff attorneys every year seeking to take a stand against union bosses' special powers, corruption, and coercion.

You see, the Supreme Court's order leaves intact a significant victory won by Florida Mardi Gras Gaming employee Martin Mulhall. Under the *Mulhall* decision, backroom union card check agreements that allow union bosses to sell out workers' rights in exchange for corporate concessions and valuable organizing assistance can be found illegal under federal law.

While we were hoping the U.S. Supreme Court would outright strike down “neutrality agreements” that treat workers' rights as a bargaining chip, the courageous actions of one worker have helped equip workers across the nation with another tool to challenge these backroom union organizing deals.

Your generous support allows us continue to help workers like Mr. Mulhall fight for freedom in America's workplaces. Thank you.

Sincerely,

Mark Mix