



# Foundation *Action*

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

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## Foundation Prepares to Defend New West Virginia Right to Work Law

*Right to Work task force established to defend labor reform from union boss counter-attacks*

SRPINGFIELD, VA – On February 16, 2016, The National Right to Work Legal Defense Foundation announced the creation of a special task force to defend and enforce West Virginia's newly-enacted Right to Work law. The creation of the task force followed the West Virginia legislature's vote to override Governor Earl Ray Tomblin's veto of pending Right to Work legislation, making West Virginia the 26th Right to Work state.

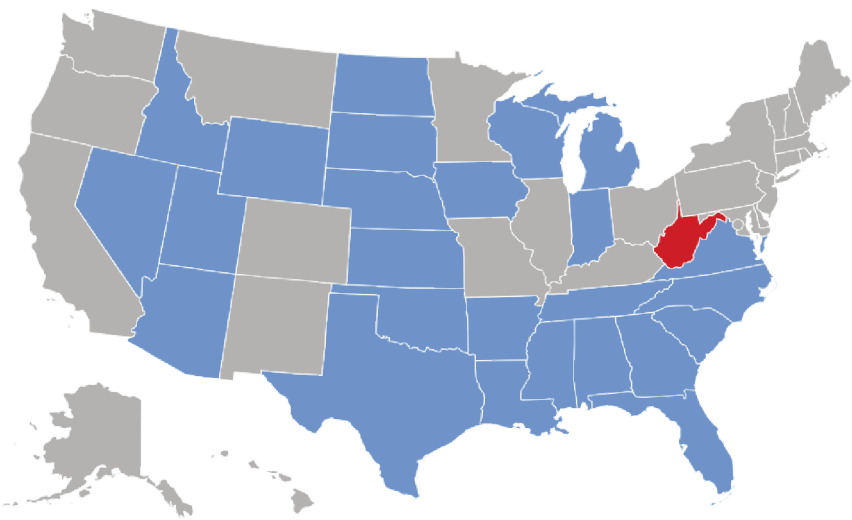
Foundation staff attorneys, at the request of legislators, reviewed the text of the bill as it was moving through the legislative process and are now preparing to defend the West Virginia Right to Work law from any spurious union legal challenges.

In addition to preparing to defend the law from Big Labor counter-attacks, Foundation staff attorneys are also offering free legal aid to Mountain State workers who wish to exercise their new right to refrain from the forced payment of union dues or fees.

### Foundation defends Right to Work laws in court

Once the law takes full effect on July 1, 2016, and current union monopoly bargaining agreements expire, no West Virginia worker can be required to pay union dues to get or keep a job.

Unfortunately, union officials often try to stymie independent-minded



***Now that West Virginia has become America's 26th Right to Work state, Foundation litigators are gearing up to defend the new law in court.***

workers who seek to exercise their rights under Right to Work laws.

Union officials continue to ignore or circumvent other state Right to Work laws years after the laws were enacted. In just the latest example of this union legal tactic, Foundation staff attorneys had to intervene for Michigan public school teachers who were told they had to pay mandatory union "agency fees" to keep their jobs.

Michigan's Right to Work law has been on the books since 2013, but that didn't stop a local union from demanding over five hundred dollars in fees from Jeffery Finnan and Corey Merante, two teachers employed by the Anne Arbor Public School District. The teachers are now fighting union officials'

forced-dues demands at the Michigan Employee Relations Commissions with the help of Foundation attorneys. Many

*See NEW RIGHT TO WORK LAW page 8*

### IN THIS ISSUE

- 2 Appeals Court Rules in Massachusetts Homecare Unionization Case
- 3 Tax Season Looms! Support Right to Work, Reduce your Tax Hit
- 4 Union Bosses Flee Two Workplaces to Avoid Being Ejected by Employee Votes
- 6 Scalia's Death Leaves Case Challenging Public-Sector Forced Dues in Flux
- 7 Commentary: Mandatory union dues violate First Amendment

## Appeals Court Rules in Massachusetts Homecare Unionization Case

**Foundation attorneys argue that mandatory union “representation” violates First Amendment**

BOSTON, MA - In early February, a National Right to Work Foundation case challenging a Massachusetts forced homecare unionization scheme moved one step closer towards a potential showdown at the United States Supreme Court.

The First Circuit Court of Appeals in Boston issued a decision upholding Big Labor’s scheme, ruling that union monopoly bargaining does not violate caregivers’ First Amendment rights.

“Although we’d hoped that the appeals court would free these caregivers from forced union representation, this legal fight is not done. Foundation attorneys are preparing to ask the Supreme Court to consider this case,” said Ray LaJeunesse, vice president and legal director of the National Right to Work Foundation.

The lawsuit, which was brought by Kathleen D’Agostino and eight other caregivers, challenges a law that requires Massachusetts childcare providers to accept union “representation” concerning their caregiving practices. The lawsuit builds on the Foundation’s 2014



**A case brought by Foundation staff attorneys challenging mandatory union bargaining for homecare providers could end up before the United States Supreme Court.**

Supreme Court victory in *Harris v. Quinn*, which outlawed mandatory union dues for home-based care providers who indirectly receive state subsidies. On January 5, 2016, Foundation staff attorneys argued the case before the First Circuit Court for D’Agostino and her fellow plaintiffs.

“With free legal aid from Foundation staff attorneys, D’Agostino has mounted a legal challenge to what we believe is a clear violation of her fundamental First Amendment right to freedom of association,” said LaJeunesse.

### Lawsuit builds on *Harris* Supreme Court Victory

D’Agostino and her co-plaintiffs aim to halt implementation of a state law that designates SEIU Local 509 as the monopoly bargaining agent for thousands of Massachusetts homecare providers, including many who have no interest in joining or associating with the union.

Currently, union officials are allowed to negotiate providers’ caregiving practices and the subsidies low-income families receive from the state for childcare-related expenses. All Massachusetts childcare providers are forced to accept the union’s monopoly bargaining, which means that caregivers are prohibited from negotiating for themselves.

The providers are either small business owners or family members caring for relatives’ children.

Foundation attorneys argued that this arrangement violates the providers’ First Amendment right to choose with whom they associate to petition their government by foisting union bargaining on those who have no interest in joining or supporting the SEIU.

See **HEMOCARE CASE** page 5

## Foundation Action

Rev. Fred Fowler  
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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.

**Correction:** In the January/February 2016 issue of **Foundation Action**, Foundation client Laura Fries was misidentified as a pharmacist in the article, “Foundation attorneys help Michigan employees assert their Right to Work.” She is a pharmacy technician.

# Tax Season Looms! Support Right to Work, Reduce Your Tax Hit



We are quickly approaching the April 15th tax deadline, and many of our generous National Right to Work Foundation supporters are considering tax-saving options with careful financial and estate planning for 2016.

Reviewing proposed changes in economic and tax policy today will ensure that your future tax hit will be easier in this important election year. Many areas of uncertainty remain, including the volatile stock market and investment accounts.

As mentioned in previous issues of **Foundation Action**, the tax-free IRA Charitable Rollover was a year-to-year distribution for those donors 70 ½ years and older that expired each year. The good news is that this charitable rollover is now permanent! You may choose to contribute up to \$100,000 directly to the National Right to Work Foundation by contacting your IRA custodian and asking them to transfer a gift from your IRA today.

Here are the basic provisions for you to review to make an IRA gift today to the National Right to Work Foundation:

- This law applies to donors who are 70 ½ years of age or older;
- This law allows a donor to transfer up to \$100,000 to the 501(c)(3) tax-deductible Foundation in a calendar year;
- If the donor chooses to make such a gift, the gift will not be treated as a taxable withdrawal to the donor;
- The gift must go directly from the IRA trustee or custodian to the Foundation. Your investment advisor, IRA trustee, or custodian should have the necessary forms to make this gift;

- Donors who have not taken their “required minimum distribution” for 2016 may enjoy significant tax savings by having the amount distributed to the Foundation as a charitable IRA rollover;

- Because the IRA funds are not being taxed, the result would be equivalent to a full income tax deduction – which may be particularly valuable for NON-ITEMIZERS!

Remember, you may donate up to \$100,000 today from a traditional IRA or Roth IRA, without including the amount of the IRA distribution in gross income.

As with all planned gifts, we encourage you to consult your own legal or tax advisor to be sure you receive the maximum benefits for you and your family. If you have any questions, or would like to make a gift today, please contact Ginny Smith at 1-800-336-3600, ext. 3303. Thank you for your continued support of the National Right to Work Foundation.

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## Union Bosses Flee Two Workplaces to Avoid Being Ejected by Employee Votes

*Two unions “disclaim representation” rather than face dissatisfied employees at the ballot booth*

CARTERET, NJ and St. LOUIS, MO - Union officials recently left two workplaces in New Jersey and Missouri rather than face pending union decertification elections they were certain to lose. Although the decisions mean that hundreds of employees can no longer be forced to pay union dues, the abrupt withdrawals highlight the fact that in many workplaces, union officials do not actually enjoy majority support and only retain their special privileges through sheer inertia.

In both cases, the employees who spearheaded the decertification campaigns received free legal assistance and advice from National Right to Work Foundation staff attorneys.

“Once union bosses get into a workplace, they’re almost impossible to remove,” said Patrick Semmens, vice president of the National Right to Work Foundation. “Many unions are legacy institutions that were voted in years or even decades ago and no longer reflect employee sentiment.”

“These unions hold on because many employees simply don’t know how to get rid of them or are discouraged by the National Labor Relations Board’s (NLRB) onerous and time-consuming decertification process,” continued Semmens. “In these two workplaces, it took lengthy, employee-led decertification campaigns to make union bosses realize they were no longer welcome.”

### St. Louis hospital workers force unwanted union out

In late December 2015, Nichole Cook, a Des Peres hospital employee who received free legal aid from National Right to Work Foundation staff attorneys, submitted a petition to the NLRB asking for a vote to remove the SEIU from her workplace. The



***Union bosses walked away from Nichole Cook’s St. Louis, Missouri workplace to avoid a humiliating public loss at the ballot box.***

employees’ petition prompted the Board to schedule a union decertification election for January 13, but that vote was cancelled after union officials announced they were “disclaiming representation” and walking away from the Des Peres bargaining unit. The affected employees are 170 technicians, secretaries, and other hospital support staff.

According to Cook, SEIU officials were unresponsive to employees’ workplace concerns: “Several employees reached out to the union regarding job-related issues. None of these individuals received any type of correspondence back from the union. The union turned their backs on them.”

However, when union officials realized their forced-dues privileges were at stake, they suddenly started paying attention to the hospital.

“Ironically, during the time period between the initiation of the petition and the decertification election, union reps were a constant, and almost intrusive, presence at the hospital,” said

Cook. “While union reps were essentially non-existent at the hospital over a three-year period, they now found the time to make cold calls to employees’ homes to plead their case.”

SEIU officials were empowered to collect dues from Cook and her coworkers because Missouri lacks a Right to Work law. The contract between Des Peres Hospital and the SEIU included a provision that required all employees in the bargaining unit, including nonmembers, to contribute money to the union. Now that the union has left, Cook and her coworkers can no longer be forced to pay dues to the SEIU.

Fortunately, Cook and her coworkers were able to rid themselves of an unwanted union shortly after filing for a decertification election. Other employees endure lengthy battles to obtain a similar result.

### Holiday Inn workers fight for years to remove union

Faced with overwhelming employee opposition, The New York Hotel and Motel Trades Council Local 6 union also decided to walk away from a workplace rather than face an embarrassing election loss. The campaign to remove the

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unwanted union was led by a group of Carteret, New Jersey Holiday Inn employees who also received free legal assistance and advice from National Right to Work Foundation staff attorneys. Unfortunately, this group of employees had to wait for nearly two years before union officials surrendered their forced-dues privileges.

Holiday Inn employee Michelle Buniak originally submitted a union decertification petition in September 2014. The petition, which was signed by a majority of her coworkers, asked her employer to remove Local 6 from the hotel. Buniak's employer responded by seeking a secret ballot election to determine the union's fate, but union officials refused to leave without a fight.

Union lawyers avoided immediate eviction by filing a barrage of spurious unfair labor practice charges against Holiday Inn at the NLRB. After almost a year of delay, NLRB bureaucrats finally scheduled a union decertification election for February 12, 2016.

According to several of Buniak's coworkers, union officials resorted to bribes and harassment to persuade Holiday Inn employees to vote for Local 6. Fortunately, union bosses eventually decided to avoid a public election loss and announced that they would walk away from the bargaining unit.

Local 6 officials had bargained for all Carteret Holiday Inn employees, including those who didn't belong to the union, for over two decades. As with the hospital employees in Missouri, the New Jersey union's contract with the company included a provision that allowed union officials to collect mandatory dues and fees from every employee, union and nonunion alike.

"In both of these cases, union bosses had long outstayed their welcome but were still empowered to collect mandatory union dues from employees," said Semmens. "Unfortunately, these New Jersey hotel employees had to wait two years to free themselves from the burden of forced union dues."



## NLRB stacks the deck against removing unions

Thanks to their unstinting efforts and the help of National Right to Work Foundation staff attorneys, employees in both workplaces can no longer be forced to pay dues to unwanted unions. Their experiences highlight the difficulties workers face when attempting to get rid of stubborn union bosses.

According to a recent Century Foundation survey, less than one percent of Pennsylvania public school teachers in unionized workplaces have actually voted in unionization elections. Other studies have reached the same conclusion: A clear majority of unionized employees have never actually voted for a union. However, many unions continue to hold on to their workplace privileges because they do not face a regular reelection schedule. Unless and until employees overcome inertia or NLRB obstructionism to get rid of an unwanted union, union officials can remain in place indefinitely.

"We are happy to report that these employees have gotten rid of two unwanted unions," said Semmens. "Unfortunately, both instances highlight the numerous barriers workers face when attempting to remove obstinate union bosses. The decertification process should be streamlined to help workers remove unwanted unions."

## Homecare Case

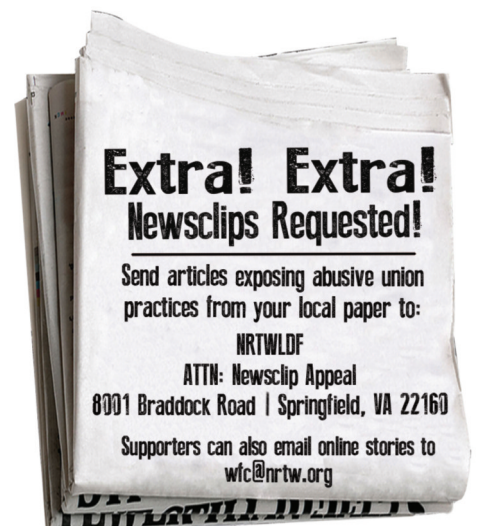
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Prior to the Foundation's *Harris* Supreme Court victory, Massachusetts law empowered union officials to collect forced dues from all home childcare providers. Foundation attorneys contend that the *Harris* precedent suggests that caregivers should also be free from the burden of accepting an unwanted union's bargaining.

The fight against monopoly union bargaining for homecare providers is particularly vital because union organizers have not limited these schemes to Massachusetts. Childcare providers have become a new favorite target of Big Labor bosses looking to expand the reach of forced unionism.

Foundation staff attorneys are currently helping home and childcare providers challenge similar schemes in several states, including Minnesota, Illinois, New York, Oregon, and Washington State.

"Whatever happens in the lower courts, the issue of forced union representation will likely have to be resolved by the Supreme Court. The Foundation is prepared to fight for these caregivers – and caregivers around the country – until they can no longer be forced to accept union representation, no matter how long it takes," said LaJeunesse.





# Scalia's Death Leaves Case Challenging Public-Sector Forced Dues in Flux

## *Oral arguments in Friedrichs raise tough questions for advocates of forced unionism*

WASHINGTON, DC - On a cold morning in early January, the United States Supreme Court heard arguments in *Friedrichs v. California Teachers Association*, a case that could end mandatory union dues in the public sector. The case builds on two recent National Right to Work Foundation Supreme Court victories to challenge public-sector union officials' extraordinary forced-dues powers.

"I'm always wary of predicting which way the High Court will jump," said Mark Mix, president of the National Right to Work Foundation. "A majority of the justices had expressed skepticism of public sector union bosses' forced-dues powers in *Knox v. SEIU* and *Harris v. Quinn*, two recent Foundation victories. Unfortunately, Justice Scalia's untimely death makes it even more difficult to predict what the High Court will ultimately decide."

## Several Justices express skepticism of forced dues

*Friedrichs* was brought by 10 California public school teachers who have to pay dues to a union to which they don't belong as a condition of employment. In oral arguments, the plaintiffs' attorney pointed out that union bargaining in the public sector cannot be separated from political questions about the size and scope of government. The Supreme Court has long held that no employee can be forced to pay dues for union politics, and the teachers contend that the dues they are forced to pay for union bargaining fall squarely into that category.

Several of the justices seemed sympathetic to the plaintiffs' argument. "The problem is that everything that is collectively bargained with the government is within the political sphere, almost by



**Justice Antonin Scalia's sudden passing leaves the outcome of a case challenging public-sector forced union dues in doubt.**

definition," said Justice Scalia, commenting on what would be one of the last Supreme Court cases heard before his death in February.

Justice Anthony Kennedy echoed Scalia's comments: "It's almost axiomatic. When you are dealing with a governmental agency, many critical points are matters of public concern. And is it not true that many teachers strongly, strongly disagree with the union position on teacher tenure, on merit pay, on merit promotion, on classroom size?"

## Kennedy: "The union is making these teachers compelled riders"

In short, Kennedy explained, the teachers are being forced to subsidize political activities that they strongly disagree with, something that runs afoul of long-standing Supreme Court precedent.

Kennedy, who is often a critical swing vote on the nine-member Supreme Court, also took aim at the union justification for forcing teachers to pay dues: "The union basically is making these

teachers compelled riders for issues on which they strongly disagree."


The justices' skeptical remarks sent pro-Big Labor commentators into a tizzy. Several pro-union boss pundits insisted that public-sector unions can't survive without access to forced dues.

"This hysterical reaction is a sad commentary on the state of the modern labor movement," said Mix. "Public sector union bosses can't imagine a world in which they're no longer able to force nonunion civil servants to pay dues."

## Foundation stands ready to enforce favorable decision

Scalia's unexpected death makes the ultimate outcome of the *Friedrichs* case even more uncertain. Legal commentators are unsure how a Supreme Court vacancy will affect the Court's eventual decision. The Court could issue a deadlocked 4-4 ruling, in which case the forced-dues status quo would remain unchanged. The justices could also order the case re-argued once Scalia's successor is appointed.

Even if the Supreme Court eventually rules against public sector forced dues in *Friedrichs*, the resulting precedent would have to be vigorously enforced if civil servants are to actually benefit. National Right to Work Foundation staff attorneys anticipate that union bosses will do everything in their power to circumvent a decision that outlaws public-sector forced dues.

"We are hoping for the best and preparing for the worst," said Mix. "If the Court rules against public-sector forced dues, Foundation staff attorneys stand ready to enforce that precedent. In the event of a less favorable outcome, we will continue to fight for independent-minded civil servants' rights as we have for five decades." 

# The Washington Times

## NATIONAL RIGHT TO WORK FEATURED COMMENTARY

### MARK MIX: Mandatory union dues violate First Amendment

If you belonged to a club that benefited other members at your expense, would you consider leaving? Would you resent it if the club collected dues from all members but only provided benefits to a select few?

Of course you would. Across the country, voluntary organizations thrive because all of their members derive benefits from joining and participating. Churches, civic associations, and hobbyist groups exist because supporters voluntarily decide these groups merit their time, energy and money.

Only one type of private organization doesn't play by the same rules. For decades, union officials have been empowered by federal and state law to collect mandatory dues from employees who haven't actually joined a union. But a landmark Supreme Court case could change all that for America's civil servants.

This Monday, the Supreme Court will hear *Friedrichs v. California Teachers Association*, a case brought by 10 California public school teachers. The teachers are challenging a policy that requires them to pay dues to a union they don't belong to or support. The case builds on two recent National Right to Work Foundation Supreme Court victories — *Knox v. SEIU* (2012) and *Harris v. Quinn* (2014) — that raised serious doubts about the constitutionality of mandatory union dues or fees for public employees.

In both *Knox* and *Harris*, the Supreme Court ruled against forced dues on narrow grounds, but the *Friedrichs* case places a broad First Amendment challenge to all public sector forced dues squarely and unavoidably before the High Court. In *Knox*, Justice Alito's majority opinion called forced dues for public employees "something of an anomaly" in American jurisprudence. In *Friedrichs*, the plaintiffs are asking the Court to correct that anomaly once and for all.

The injustice of forcing employees to subsidize an organization they don't belong to and disagree with should be readily apparent, but the arguments in *Friedrichs* also highlight the faulty logic behind unions' own justifications for collecting forced dues. California Attorney General Kamala Harris, an ambitious politician whose career has benefited from union bosses' largesse, actually admitted that union bargaining disadvantages many teachers in a brief filed in support of the California Teachers Association.

Wrote Ms. Harris: "Unions do have substantial latitude to advance bargaining positions that ... run counter to the eco-

nomics interests of some employees." In other words, Ms. Harris implicitly concedes that many teachers are being forced to pay money for a union to advocate policies contrary to their own best interests.

This admission comes as no surprise to the plaintiffs, who argue that they are disadvantaged by union policies that favor colleagues with more seniority. But it is striking to see a Big Labor ally publicly acknowledge that union policies hurt the same teachers who would currently lose their jobs if they refused to contribute to the union's coffers.

Naturally, union apologists have advanced other arguments to defend Big Labor's forced-dues privileges. One popular refrain is that public sector unions couldn't attract and retain members without the financial backing of every employee in a given workplace.

This specious claim is easily disproved. For one, many unions continue to thrive in Right to Work states, which have outlawed mandatory dues. Moreover, even if public sector unions lose their forced-dues privileges, they will retain immense influence over employee-employer relations, something that will continue to induce many workers to join.

American labor law, which applies even in states that have outlawed mandatory union dues, empowers union officials in unionized workplaces to impose a contract — which covers wages and working conditions — on all employees, including those who don't belong to the union. This unparalleled power helps unions attract dues-paying members who have decided they want a say in an organization that, for better or worse, has been handed a monopoly on workplace bargaining.

Of course, union apologists don't like to publicly acknowledge unions' privileged workplace status because doing so would undercut the rationale for their forced-dues powers. But that shouldn't discourage the Supreme Court from striking down forced union dues in the public sector. Government employees should decide for themselves if financially supporting a union is really in their best interest, something that even union defenders have admitted is often not the case.

*Mark Mix is president of the National Right to Work Foundation. This op-ed first appeared in The Washington Times.*

## New Right to Work Law

continued from page 1


West Virginia employees can expect to face similar hurdles if they wish to assert their newly-established rights.

## Defending workplace freedom in West Virginia

“Union bosses make it as hard as possible for workers to exercise their right to refrain from paying any union dues or fees. Right to Work laws must be vigorously enforced to take full effect, which is why the Foundation has launched this special task force,” said Patrick Semmens, vice president of the National Right to Work Foundation.

Fortunately, Foundation litigators can draw on years of experience in helping employees exercise their workplace rights, most recently under Right to Work laws enacted in Indiana, Michigan and Wisconsin.

“As we’ve seen in Wisconsin, Michigan, and Indiana, Big Labor is never willing to give up its forced-dues privileges without a fight. We expect union bosses to try to tie up the law in court, but our staff attorneys have plenty of experience defending Right to Work laws, which we have successfully done in states across the country,” added Semmens.

Any West Virginia worker who has questions about his or her rights, or encounters any resistance or abuse while trying to exercise his or her workplace rights, is encouraged to contact Foundation staff attorneys for free legal aid. 

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Work updates, visit  
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## Message from Mark Mix

President  
National Right to Work  
Legal Defense Foundation

Dear Foundation Supporter:

It’s been an exciting – and tumultuous – time for friends of workplace freedom. West Virginia has just become the nation’s 26th Right to Work state, an important milestone on the long road to ending forced unionism.

Meanwhile, Justice Antonin Scalia’s unexpected passing has made it even more difficult to predict the outcome in *Friedrichs*, a Supreme Court case that could end all mandatory union dues in the public sector.

What happens next? As you’ll read about in this issue of **Foundation Action**, Right to Work attorneys are already preparing to enforce the new West Virginia Right to Work law and defend it in court from the inevitable Big Labor counter-attacks. Our litigators are also crafting legal strategies to respond to every possible decision the High Court might hand down in *Friedrichs*.

Whatever happens, it’s worth taking a moment to reflect on how much we’ve accomplished and the work that remains. Beginning over 40 years ago, the Foundation has taken a long-term strategic view in the battle against compulsory unionism, and I’m more convinced than ever that this is the correct approach.

Just as Right to Work laws aren’t passed overnight, the Foundation’s legal program does not hinge on one or two high-profile cases. Although we’ve been to the Supreme Court 17 times, we take just as much pride in the thousands of smaller victories we’ve won in lower courts and in the federal labor bureaucracy.

These victories serve multiple purposes: They defend individual employees against the abuses of forced unionism and they build an even stronger legal foundation to fight and end forced unionism.

As a Foundation supporter, you know that several important Foundation legal victories laid the groundwork for the arguments the Supreme Court is now considering in *Friedrichs*. That’s just the latest example of our long-term strategy in action.

Of course, this approach isn’t easy, but the millions of workers impacted by our victories can attest to how important our strategy is. That’s why I’m so grateful for all of our supporters who make it possible. We’re in this fight for the long haul, and we couldn’t do it without your help.

Sincerely,

Mark Mix