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Foundation Spurs State Attorneys-General to Defend Worker Freedom

Concerned citizens' action makes a direct impact on forced-dues challenge at Supreme Court

WASHINGTON, DC - When the United States Supreme Court opened its 2015-2016 term in September, legal observers, commentators, and pundits from across the political spectrum pointed to *Friedrichs v. California Teachers Association* as one of the most pivotal and highly-watched cases the Court will consider this year.

Now, thousands of Right to Work supporters have prompted 18 state attorneys-general to sign on to a

Supreme Court brief opposing public sector forced unionism.

"It speaks to the effectiveness of the National Right to Work Foundation's programs that not only is the High Court now taking a serious look at protecting freedom of association, one of the most vital rights in our constitutional republic, but that members of the press, the public, and elected officials nationwide recognize the importance of the issue," said Foundation President Mark Mix.

The case, brought by the Center for Individual Rights for several nonunion California public school teachers, builds completely on the Foundation's legal victories in *Harris v. Quinn* and *Knox v. SEIU*. In both cases, the Supreme Court questioned the constitutionality of mandatory public-sector union dues.

Foundation staff attorneys recently filed an *amicus curiae* ("friend of the court") brief in the case, arguing that civil servants should not be forced to pay union dues simply because union officials have chosen to bargain for



Thanks to the efforts of Right to Work supporters, 18 state attorneys-general have signed on to a brief opposing forced dues in the public sector.

all employees – nonunion and union alike – in a given workplace.

In the brief, Foundation staff attorneys also lay bare union lawyers' faulty legal reasoning by showing "exclusive representation' how actually confers enormous benefits on union officials, who are empowered to negotiate with the state and receive tremendous influence in the workplace, and therefore have no justification for collecting mandatory monetary contributions from nonunion civil servants.

Outreach builds support

Meanwhile, as public attention has been drawn to the issue since the Court announced it would hear Friedrichs in June, the Foundation's public information staff has countered union-boss propaganda in the press by informing the public

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Driver Who Suffered Union Discrimination Finally Receives Back Pay

After six years, Teamster bosses are forced to pay for preventing nonmember from working

WASHINGTON, DC – Despite the best efforts of union lawyers, Teamster Local 509 union officials are finally paying a worker more than \$55,000 in back pay he lost when they prevented him from

getting work.

In early October, the United States Court of Appeals for te District of Columbia Circuit affirmed a National Labor Relations Board (NLRB) decision awarding back pay to ABC employee Thomas Coghill. Faced with a longshot appeal to the U.S. Supreme Court, Teamsters Local 509 bosses will finally fork over the money, plus interest, for discriminatory practices they committed in 2009.

"It's been a long fight," said Patrick Semmens, vice president of the National Right to Work Foundation. "After six years, Thomas Coghill will finally receive the pay he was denied by discriminatory monopoly union policies."

Long legal battle pays off

The decision by union lawyers not to attempt another longshot appeal ends a prolonged legal battle between Coghill and South Carolina



A driver for the ABC Studios show "Army Wives" has finally received compensation for work he was denied under a discriminatory union policy.

Teamster bosses. The case began when Coghill, a driver for ABC Studios, filed unfair labor practice charges in 2009.

Teamster Local 509 union officials had a monopoly bargaining agreement with ABC in South Carolina that forced workers to go through the union's hiring hall to get a job during production of the ABC show "Army Wives." Coghill – a member of a different Teamster

local – was hired during the show's first two seasons after demand for drivers outpaced the number of workers that Local 509 could refer.

However, as more Local 509 union members became available to work on the production of "Army Wives," Teamster officials refused to refer Coghill again because he was not a Local 509 member, and rejected his request to transfer his membership.

Coghill's charges contested the union's policy on the grounds that federal labor law prohibits union officials from discriminating against nonunion employees. At the NLRB, National Right to Work Foundation staff attorneys helped Coghill recoup more than \$55,000 in back pay, a judgment that the union has now grudgingly accepted.

"My advice to anyone in this situation is to know your rights and seek help from the appropriate source," said Coghill. "I would also like to acknowledge W. James Young from National Right to Work for [his] hard work and diligence

arguing this case."

Case puts the spotlight on Foundation's legal program

Although Coghill eventually forced Teamster bosses to compensate him for lost wages, many employees are unable to fight discriminatory union practices. Navigating the court system or the NLRB bureaucracy is a daunting prospect for full-time workers who don't have the legal expertise or the time to take union lawyers head-on.

"The National Right to Work Foundation's legal aid program has the resources and wherewithal to fight union abuse at every level, from the NLRB to the Supreme Court," said Semmens. "Thomas Coghill's long fight to reclaim his lost wages highlights the importance of our attorneys work for union-abused employees." The said Semmens and supplementations are supplementations.

Foundation Action

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Foundation Attorneys Help Employees Fight to Remove Unwanted Union

Biased NLRB tries to block employee vote to oust unwanted UAW officials

FLORENCE, SC – Two workers at a Johnson Controls battery plant in Florence, South Carolina, have filed a motion to intervene with the National Labor Relations Board (NLRB) in an ongoing case involving a union they and their coworkers wish to remove from their workplace. The two employees, Brenda Lynch and Anna Marie Grant, are receiving free legal assistance from National Right to Work Foundation staff attorneys.

Lynch and Grant's case highlights the difficulties employees face when attempting to remove an unwanted union, as well as the Obama NLRB's persistent bias in favor of union bosses' workplace privileges.

In early September, the NLRB General Counsel issued a formal complaint against Johnson Controls regarding its Florence plant. The complaint alleged that the company committed an unfair labor practice by withdrawing recognition of UAW Local 3066 as the employees' monopoly bargaining agent.

The company withdrew recognition after a majority of workers submitted a petition declaring that they no longer wanted the union's so-called "representation." The NLRB General Counsel, however, deemed the withdrawal petition invalid and demanded that the company restore the UAW's privileged bargaining position.

In response to these developments, Lynch, who helped organize the withdrawal initiative with several of her coworkers, submitted to the NLRB a petition for a secret ballot election to formally remove the union. Rather than hold a secret ballot vote to determine employees' wishes, the NLRB, at the UAW's urging, blocked the election, citing the pending complaint against the company.

With the help of Foundation staff attorneys, Lynch and Grant have



The Obama Labor Board has consistently stymied employee-led efforts to removed unwanted unions from their workplaces.

since moved to intervene in the dispute over the company's alleged unfair labor practice charges. If granted intervenor status, Lynch and Grant will, through their Foundation-provided attorneys, be able at trial to represent their own interests, and those of the majority of employees who oppose the UAW. They will have the ability to testify, call and examine witnesses, and present legal and factual arguments to protect their and other employees' rights to eject an unwanted union.

NLRB favors union bosses

"Once again, the NLRB is favoring union bosses' privileges over the rights of independent-minded employees," said Ray LaJeunesse, vice president of the National Right to Work Foundation. Unfortunately, this is far from an isolated incident. The Board has delayed and even blocked employee-led union decertification drives repeatedly."

The NRLB has frequently resorted to bureaucratic and legal stalling tactics to keep unwanted unions in place. Lynch and Grant's experience with the UAW is just the latest example of this trend.

recent Congressional testimony, Glenn Taubman, veteran Foundation staff attorney, cited numerous instances in which the Board has delayed or blocked union decertification drives on spurious grounds. Said Taubman: "The NLRB has created aggressive procedures to speed up certification elections and help unions get into power, but ignores blocking charges and election bars that hinder or completely deny employees' ability to decertify the union."

Meanwhile, Foundation attorneys have been involved in several other worker-led efforts to remove unwanted unions. In one recent episode, workers at a Hamilton, Alabama ball bearing plant had to vote on removing a union five times before UAW officials were finally forced to relinquish their monopoly bargaining privileges. Thanks to the timely intervention of Right to Work staff attorneys, the employees were eventually able to eject the UAW, but they had to clear numerous bureaucratic hurdles before the NLRB upheld their vote.

Union lawyers have become particularly adept at gaming the NLRB's rules and regulations to hamper union decertification drives. Regular readers may remember that the last issue of Foundation Action reported on a union decertification drive led by an Orlando based Golf Channel employee. Rather than leave gracefully, union officials asked the NLRB to dismiss the entire process over a few minor issues with the employee's paperwork.

"The Óbama National Labor Relations Board has been a boon for stubborn labor bosses," said LaJeunesse. "Independent-minded workers, on the other hand, often face an uphill battle to remove unwanted unions. That's why it is vital they have the National Right to Work Foundation to turn to for free legal assistance." \$\Phi\$

The Washington Times

NATIONAL RIGHT TO WORK FEATURED COMMENTARY

MARK MIX: A Chance to Make Union Dues a Choice

The Gilded Age. The Spoils System. Tammany Hall. In American politics, corrupt bargains between politicians and their supporters are supposed to be a thing of the past. But in the public sector, a troubling relationship persists between elected officials and one powerful constituency.

Thanks largely to favors granted by pliant politicians, government union officials enjoy extraordinary special privileges and wield immense political clout. This influence often comes at the expense of taxpayers and independent-minded civil servants, but an impending Supreme Court decision could change all that.

In the 25 states that lack right-to-work laws, nonunion public employees can be forced to pay union dues or fees to keep their jobs. Although union officials are technically prohibited from forcing nonunion workers to pay for political activism, this rule is difficult to enforce and often ignored. Many nonunion employees are unaware of their right to opt out. Others are simply told that all union dues are mandatory. Even employees who are aware of their rights may be reluctant to "rock the boat" in a unionized workplace.

For employees who choose to assert their workplace rights, the opt-out process can be tortuous. Many unions rely on bureaucratic ruses to discourage independent-minded workers from stepping out of line. Service Employees International Union (SEIU) Local 1000, one of the largest public-sector unions in California, is actually facing a lawsuit for trying to keep collecting full dues from unwilling employees.

According to that lawsuit, several of the plaintiffs never received notice from SEIU Local 1000 about their workplace rights. Others were only notified after a union-designated window period for objecting to the payment of full dues had already expired.

Nonunion employees who did receive the union's notice in a timely fashion found that it downplayed their right to opt out. Information about refraining from paying dues for union politics was printed in small, beige text on a pink background and inserted below the union's more prominent pitch for fullmembership.

This and similar arrangements give public-sector union officials an immense amount of cash to spend on their political agenda. According to the National Institute for Labor Relations Research, government unions spent at least \$564 million on politics in 2013 and 2014. That money buys access and special favors while insulating union officials from public accountability.

This may be bad for taxpayers and civil servants, but it's perfectly suited for ambitious politicians. Public-sector union officials enjoy extraordinary, government-granted privileges that would be considered absurd in any other context. To

protect their exalted status, they lavish spending on favored political candidates. Once in office, those same politicians are tasked with overseeing and "negotiating" with the very unions that bankroll their electoral ambitions. Is it any wonder that so many states are facing huge budget crises?

Even if union officials scrupulously respected civil servants' workplace rights, it's unclear where to draw the line between union politics and workplace bargaining. Contract negotiations in the public sector inevitably touch on highly charged ideological issues, such as the size and scope of government. Yet nonunion employees who oppose a union's bargaining tact have no choice but to pay for an activity that contradicts their political convictions.

The incestuous relationship between public-sector unions and politicians busts budgets and erodes democratic accountability. But without ready access to forced-dues cash, government unions' political influence would decline dramatically. Fortunately, the Supreme Court has just agreed to hear a case that strikes at the heart of public-sector unions' forced dues privileges. In *Friedrichs v. California Teachers Association*, a group of nonunion public school teachers is challenging a union policy that requires them to pay any union dues at all to keep their jobs.

Friedrichs gives the court an opportunity to outlaw all mandatory union dues in the public sector. To be clear, such a ruling wouldn't end government unions. Employees who genuinely support a labor organization would still be free to join up and pay dues. What it would do, however, is limit government unions' outsized political influence.

Without a guaranteed stream of income from nonunion employees, union officials wouldn't have nearly as much money to spend on friendly politicians. Moreover, unions that actually have to persuade employees to join and voluntarily contribute tend to be more focused on their members and less fixated on partisan politics.

Outlawing mandatory union dues or fees in the public sector would also limit the ability of union officials to handpick their negotiating partners in state and local government. Politicians who aren't beholden to union special interests are more likely to strike better bargains for their constituents.

Ideally, no employee — public or private — would ever be forced to pay union dues to get or keep a job. In *Friedrichs*, the Supreme Court has a chance to restore the workplace rights of America's civil servants and end the corrupting influence of public-sector forced dues on our political system.

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

Foundation Fights Push to Impose Forced Unionism on "Sharing Economy"

Foundation offers legal aid to Seattle Uber and Lyft drivers targeted by union organizers

SEATTLE, WA – Companies like Uber, Lyft and others in the "sharing" or "crowdsourcing" economy have become prime targets for union bosses as they have grown in popularity. Uber and Lyft now provide over one million rides per day by connecting consumers in need of transportation with independent drivers using their mobile apps.

Uber and Lyft drivers are independent contractors, and are therefore exempt from federal labor laws that authorize forced unionism. But that hasn't stopped union officials and their political allies from attempting to expand monopoly unionism and forced dues to the more than 150,000 active drivers using Uber and Lyft.

Unfortunately, union schemes like this are all too common. Union bosses are constantly seeking new tools to push more workers into their forced-dues paying ranks.

In the recent Foundation-won *Harris v. Quinn Supreme Court* case, union bosses convinced friendly politicians to expand the definition of "state employees" to include home healthcare workers who often work in their own home, taking care of their own children. Union bosses see independent drivers for services like Uber and Lyft as the next targets for expanding their forced-unionism ranks and filling union coffers with more forced-dues dollars.

Seattle bill would hand drivers to union bosses

In Seattle, the City Council is moving to adopt a bill that would require for hire ride sharing companies like Uber and Lyft to enter into monopoly bargaining agreements with labor unions. Under the legislation, independent drivers who drive for Uber and Lyft would be forced to accept union "representation" and would forfeit a

Independent drivers provided by mobile services like Uber and Lyft are Big Labor's latest target for compulsory unionism. Fortunately, Foundation staff attorneys are available to fight this push for more forced dues.

portion of every paycheck to union bosses.

"Soon after learning of this threat to drivers' workplace freedom, the National Right to Work Foundation issued a special legal notice to alert drivers that they could soon be forced to pay union fees to keep their jobs," said Patrick Semmens, vice president of the National Right to Work Foundation.

In addition to forcing all drivers – even the ones who did not vote for the union – to accept mandatory union representation, the Seattle legislation would require that the companies turn over every driver's personal contact information, including home address, to union bosses, an open invitation to union harassment, intimidation, and abuse.

"This bill is nothing more than a scheme by local politicians to help their Big Labor political allies by forcing even more workers into union ranks," continued Semmens.

"It is outrageous that for-hire drivers could soon be forced to forfeit a portion of their earnings to a union to continue to contract with companies like Uber and Lyft. The National Right to Work Foundation will proudly provide free legal aid to drivers opposed to this violation of their rights," he added.

Independent drivers in Seattle can contact the National Right to Work Foundation via its toll-free hotline or website to speak with a Foundation attorney about their legal options. Moreover, the Foundation is on high alert for new attempts to impose forced unionism on other independent contractors making their living in the sharing economy.

Independent drivers also targeted by union bosses in California

Seattle is not the only place where independent drivers face threats to their autonomy and workplace freedom. Big Labor bosses and their political allies in California are also devising schemes to force drivers into union ranks.

In June 2015, the California Labor Commissioner declared that an independent driver, who had previously contracted with Uber, was an "employee" of Uber, not an independent con tractor.

See NEW FORCED DUES PUSH page 8

Golden State Employees Fight Unions Bosses' Forced-Dues Schemes

Union officials' forced-dues demands undermine independent employees' rights

THOUSAND OAKS, CA Foundation litigators are no strangers to the Golden State. In workplaces across California, Right to Work staff attorneys are helping union-abused employees fight union officials' forced-dues demands.

Guillermo Cornejo, a nurses' aid at Los Robles Hospital and Medical Center in Thousand Oaks, California, was notified in March 2012 that he had been enrolled as member of the SEIU United

Healthcare Workers West union and was expected to pay full union dues. The only problem was that Cornejo never signed up to join the union, but instead had been automatically enrolled as a

member by SEIU officials.

Federal labor law protects a worker's right not to join a labor union. However, SEIU officials never informed Cornejo of his right to refrain from union membership.

Because California lacks a Right to Work law, employees can be forced to pay a fee to union bosses to get or keep a job; however, workers cannot be forced to pay for activities such as union political lobbying or activism. SEIU officials also failed to inform Cornejo of his right to refrain from

paying for union politics.

With free legal assistance from National Right to Work Foundation staff attorneys, Cornejo filed unfair labor practice charges with the National Labor Relations Board (NLRB). The Board recently issued a complaint against the union and is seeking to require that union officials properly inform all workers in the bargaining unit of their rights and reimburse, with interest, any illegally-confiscated dues.

"Unscrupulous union officials simply forced every new worker to join and pay up," said Ray LaJeunesse, Vice President of the National Right to Work Foundation. "This is an



After union officials told him that membership was mandatory, John Woodall turned to Foundation staff attorneys for help.

illegal, unacceptable practice, but such abuses are far from isolated incidents in California.

SEIU targets California hospital employees

In fact, this particular SEIU local is a repeat offender. The exact same union was hit with another complaint by the NLRB for using the same scheme at a Sacramento hospital.

In June 2015, SEIU officials informed Amy Kelsey, a nurse at Dignity Health Mercy General Hospital, that she had been enrolled as a dues-paying member and had to pay monthly union dues. Like Cornejo, Kelsey never signed up to be a member of the union. She was also not informed of her right to refrain from union membership.

Foundation staff attorneys helped Kelsey file unfair labor practice charges with the NLRB, prompting the Regional Director to issue a formal complaint on July 13. Cornejo and Kelsey's cases will now be tried together before an administrative law judge.

Golden State workplaces plaqued by forced dues

John Woodall, another California worker, recently filed federal unfair labor practice charges with the NLRB against International Union of Operating Engineers (IUOE) Local 3 after a union official threatened Woodall with an ultimatum to join up or be fired.

Woodall is employed at Waste Woodland. Management's California plant, and is not a member of the union. In mid-August, he began to notice flyers posted around his workplace by the union that said workers must to appear at the union hall in person to "make membership" by September

Confused about the flyer, Woodall spoke to a union official, who threatened him with termination if he did not join the union by September 9.

Woodall refused to join the IUOE, fully understanding that he has the right not to join a labor union without losing his job. However, he still faced the risk of being fired if the union followed through on its illegal threat.

National Right Foundation staff attorneys helped Woodall file federal unfair labor practice charges against IUOE Local 3, which the NLRB is now investigating. As of the publication of this article, IUOE bosses have backed off from their threat to have Woodall fired, likely because of the Foundation's efforts to publicize his

The Golden State isn't very golden for independent-minded employees," said LaJeunesse. "Fighting these schemes in court is important, but the only permanent solution to this type of abuse is a California Right to Work law, which would make union dues and membership strictly voluntary." **1**

Right to Work Supporters Take on Public Sector Forced Union Dues

continued from page 1

about the issues and reasoning behind the challenge.

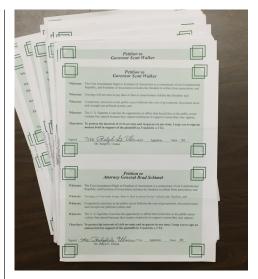
Furthermore, public pressure from Right to Work supporters encouraged several states' attorneysgeneral to intervene in the case in favor of eliminating forced dues in the public sector.

In cases pending at the Supreme Court, interested parties, advocacy groups, and elected officials will submit "friend of the court" briefs to raise arguments and provide additional perspectives that may otherwise go unheard. For instance, in litigation between union officials and employers, Foundation staff attorneys may submit a brief for individual workers to highlight the issue at stake from the perspective of employees' workplace rights.

Before the Supreme Court had decided to take the *Friedrichs* case, a group of nine state attorneys general, led by Michigan Attorney General Bill Schuette, submitted an amicus brief on behalf of their states urging the Court to take the case to protect the First Amendment rights of civil servants in their states. After the Supreme Court agreed to take *Friedrichs*, it set a deadline in September to accept additional briefs on the merits of the case.

In the month before the deadline. Foundation launched innovative program to encourage Right to Work supporters to urge their state attorney general and governor to join the merits level amicus brief. The Foundation sent mail and e-mail to supporters prompting them to contact their statewide elected officials and urge them to sign on the brief. Foundation staffers also placed targeted online advertisements in 14 Right to Work states where the action was most likely to be effective.

"By launching this program, we informed Right to Work supporters across the country how they can



Citizen activists submitted thousands of petitions asking their state officials to oppose forced unionism in the public sector.

directly impact a U.S. Supreme Court case that could end all government-sector forced dues once and for all," said Mix.

Nine of the targeted state attorneys general signed on to the brief, in addition to the original nine who filed the brief at the earlier stage of the case. Moreover, the governors of the forced unionism states of Illinois and New Mexico submitted separate briefs on the side of protecting the First Amendment rights of civil servants in their states, who currently lack the protection of Right to Work laws.

Foundation attorneys lay the groundwork for expanding worker rights

"Right to Work supporters' signatures added significant strength to the arguments for worker freedom" Mix continued. "Meanwhile, Foundation attorneys are trying to enforce the earlier court precedents that laid the groundwork for *Friedrichs*."

In last year's Foundation-won *Harris* decision, the Supreme Court

struck down forced-dues for in-home care providers whose clients receive a state subsidy for home care. These providers are not state employees, and many are parents who take care of their own children in their own homes. Although

Foundation staff attorneys argued in *Harris* that no state employee should ever be required to pay dues to a union, the Court declined to issue a broader ruling because the plaintiff caregivers were not "officially" state employees.

While *Friedrichs* is aimed at defending the First Amendment rights of all public employees, other Foundation assisted cases making their way through the courts seek to enforce and expand upon the *Harris* precedent for homecare workers across the country.

In August, Foundation staff attorneys asked the Supreme Court to hear a class action lawsuit filed by five Michigan homecare providers who were illegally forced to pay union fees. They are trying to enforce the *Harris* precedent by asking the Court to rule that union bosses must refund to all Michigan homecare providers an estimated \$4 million in illegally-confiscated union fees.

Moreover, Foundation staff attorney William Messenger recently participated in oral arguments in a Court of Appeals case that builds on *Harris*. The case contends that homecare providers should not only be protected from paying dues to an unwanted union, but they should also be protected from being forced to accept union "representation" that they have no interest in.

"National Right to Work Foundation staff attorneys were at the forefront of the line of Supreme Court cases leading to *Friedrichs*, and we'll be ready to make sure a favorable ruling is enforced," said Mix. \$\Phi\$

New Forced Dues Push

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Similarly, in August the California Employment Development Department also ruled that a former Uber driver was an employee, not a contractor.

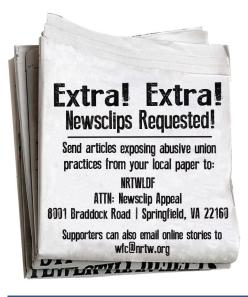
If independent, for-hire drivers are legally determined to be "employees" by a judge, the next step for union bosses is to have them declared employees for the purpose of imposing monopoly bargaining.

Drivers can then be forced to pay union dues and fees, and their independence and workplace

freedom will disappear.

Fortunately, drivers who want to stand up and oppose union bosses' attempts to impose forced unionism can turn to the National Right to Work Foundation for free legal assistance.

"We encourage Uber or Lyft drivers who don't want to be forced to accept union bargaining and pay union dues to contact us immediately," said Semmens. "Foundation staff attorneys have already helped home-based care providers fend off similar unionization campaigns. We plan to bring that experience to bear to help these drivers retain their workplace independence and protect themselves from being required to pay dues to unions they have no interest in joining or supporting." \$\frac{1}{2}\$





Message from Mark Mix

President National Right to Work Legal Defense Foundation

Dear Foundation Supporter:

As I write this note, Thanksgiving is approaching. There is no better time to say thank you, once again, for your support of the National Right to Work Foundation.

Looking back on 2015, I'm grateful for all that you have helped us accomplish. As I look forward to 2016, we will continue to rely on your support as we face new challenges in the battle against forced unionism.

As you'll read in this issue of Foundation Action, the United States Supreme Court is now considering whether forcing civil servants to pay union dues or "fees" is compatible with the First Amendment.

The case, *Friedrichs v. California Teachers Association*, builds upon recent hard fought, Foundation-won precedents. Thanks to the dedicated support of concerned citizens like you, the Foundation has been at the forefront of this issue, paving the way for the very real possibility that soon every government worker in America will enjoy Right to Work protections.

The union bosses and their government enablers are, as expected, apoplectic about the possibility that teachers and other government workers may be able to decide for themselves whether they want to subsidize Big Labor.

It's no wonder that Big Labor's high command and their puppet politicians are more determined than ever to ram as many new power grabs through Barack Obama's biased federal bureaucracy while they still can.

Not only that, they've already started unleashing another billion dollar electioneering blitz to retain their iron-clad grip on the White House and install new pro-forced-unionism majorities in Congress. Heading into 2016, your Foundation must stand guard against the illegal use of forced dues to subsidize Big Labor's radical political agenda.

Whichever way the Court rules in *Friedrichs*, I expect the Foundation's legal aid program to be as busy as ever.

That's why, in this season of giving thanks, I'm grateful for the unwavering enthusiasm and generosity of Right to Work supporters like you. Thank you.

Sincerely.

Mark Mix