

**STATE OF ILLINOIS
DEPARTMENT OF LABOR**

IN THE MATTER OF:	)	
	)	
PLUMBING CONTRACTORS ASSOCIATION	)	
OF GREATER CHICAGO & TERRY PLUMBING)	)	
	)	
Objectors,	)	State File No.: 2027-H-CC08-2361
	)	
v.	)	
	)	
JANE R. FLANAGAN, DIRECTOR of the	)	
ILLINOIS DEPARTMENT OF LABOR &	)	
THE ILLINOIS DEPARTMENT OF LABOR	)	
	)	
Respondents.	)	

PETITION TO INTERVENE

Chicago Journeymen Plumbers Local 130, UA, by its attorneys, Gregorio, Stec, Klein & Hosé, petitions to intervene in all proceedings in the above-captioned matter and states:

1. Local 130 is a labor organization representing individuals who perform work as Plumbers on prevailing wage projects in 17 Illinois counties: Bureau, Cook, DeKalb, DuPage, Grundy, Iroquois, Kane, Kankakee, Kendall, Lake, LaSalle, Livingston, Marshall, McHenry, Putnam, Will, and Woodford.

2. Section 3 of the Illinois Prevailing Wage Act (the "Act"), 820 ILCS 130/3, sets a floor. Not less than the general prevailing rate of hourly wages for work of a similar character must be paid to all laborers, workers and mechanics employed by or on behalf of any public body engaged in the construction or demolition of public works.

3. The Department set the prevailing wage for the existing Plumber classification in those counties from the collective bargaining agreement to which Local 130 is a party. Local 130 negotiated that agreement and administers it.

4. On or about August 17, 2026, the Plumbing Contractors Association of Greater

Chicago and Terry Plumbing filed written objections under Sections 4 and 9 of the Act, 820 ILCS 130/4, 130/9. They asked the Department for a hearing.

5. The Association and Terry Plumbing ask the Department to establish a new trade classification of Apprentice Plumber in the counties listed in paragraph 1. They would draw that classification's rate from the reduced apprentice wages and contributions in the collective bargaining agreement (Objections, Ex. A) they attached to their objections.

6. Local 130 brings this petition promptly after the Association and Terry Plumbing filed their objections, and before the Department has taken any evidence.

7. Local 130 meets every ground for intervention the rule recognizes, and any one of them would be enough. Section 120.320(a)(1) of Title 56 of the Illinois Administrative Code allows the Administrative Law Judge, on timely written application, to permit intervention when “(A) The party is so situated that he or she may be adversely affected by a final order arising from the hearing; (B) The party requesting intervention is a necessary party to the hearing proceeding; or (C) A party's claim or defense and the main action have a question of law or fact in common.”

8. Section 9 of the Act already contemplates that parties beyond the Department will put on evidence at these hearings. Under 820 ILCS 130/9, “any interested objectors may ... introduce such evidence as is material to the issue.”

9. Local 130 is a necessary party to this hearing. The Department drew the existing Plumber prevailing wage from Local 130's collective bargaining agreement, and the Association and Terry Plumbing refer to rates contained in that collective bargaining agreement.

10. The objections are primarily legal. Whether the Act permits the Department to establish an Apprentice Plumber classification, and at what rate, presents a question of law common to the objections and to Local 130's position.

11. Local 130's intervention will not delay this hearing or prejudice anyone. Local 130 seeks no continuance and raises no issue outside the scope of the objections. Its participation will give the Department a complete record on a rate drawn from Local 130's own agreement. Section 120.320(a)(2) asks for nothing more.

Chicago Journeymen Plumbers Local 130, UA, asks the Administrative Law Judge to enter an order granting this petition and allowing Local 130 to intervene in all proceedings in this matter.

Respectfully submitted,

**CHICAGO JOURNEYMEN PLUMBERS
LOCAL 130, UA**

By: /s/ Kyle R. Sullivan
One of its attorneys

Gregory José
Andrew Pigott
Kyle R. Sullivan
Gregorio, Stec, Klein & José, LLC
Two N. LaSalle St.
Suite 1650
Chicago, Illinois 60602
(312) 263-2343
ksullivan@gregoriolaw.com

**STATE OF ILLINOIS
DEPARTMENT OF LABOR**

IN THE MATTER OF:	)	
	)	
PLUMBING CONTRACTORS ASSOCIATION	)	
OF GREATER CHICAGO & TERRY PLUMBING)	)	
	)	
Objectors,	)	State File No.: 2027-H-CC08-2361
	)	
v.	)	
	)	
JANE R. FLANAGAN, DIRECTOR of the	)	
ILLINOIS DEPARTMENT OF LABOR &	)	
THE ILLINOIS DEPARTMENT OF LABOR	)	
	)	
Respondents.	)	

AMENDED CERTIFICATE OF SERVICE

I served the attached Petition to Intervene on September, 1, 2026, by certified mail and electronic mail to the following individuals:

Honorable Michelle Bryant-Smith
Chief Administrative Law Judge
Illinois Department of Labor
160 N. LaSalle Street, Suite C-1300
Chicago, IL 60601
Dol.hearings@illinois.gov

Jane Flanagan, Director
Illinois Department of Labor
160 N. LaSalle Street, Suite C-1300
Chicago, IL 60601
jane.flanagan@illinois.gov

Deborah Baker, Esq.
General Counsel
Stephanie Barton, Esq.
Deputy General Counsel
Illinois Department of Labor
160 N. LaSalle Street, Suite C-1300
Chicago, IL 60601
Deborah.j.baker@illinois.gov
Stephanie.barton@illinois.gov

Christina Wernick, Esq.
Laner Muchin, Ltd.
515 N. State St., Ste. 2400
Chicago, IL 60654
CWernick@lanerlaw.com

By: /s/ Kyle R. Sullivan
Attorney for Petitioner

Kyle R. Sullivan
Gregory W. Hosé
Gregorio, Stec, Klein & Hosé, LLC
Two N. LaSalle St., Ste. 1650
Chicago, Illinois 60602
ksullivan@gregoriolaw.com
ghose@gregoriolaw.com

GREGORIO, STEC, KLEIN & HOSE, LLC
ATTORNEYS AT LAW
TWO NORTH LASALLE STREET
SUITE 1650
CHICAGO, ILLINOIS 60602

9589 0710 5270 1193 0530 54
SEP 01 2026 PM 4:11
FIRST-CLASS PERMIT NO. 604 CHICAGO, IL



US POSTAGE TM PITNEY BOWES
ZIP 60602 02 7H
0006032340 \$ 010.98⁰
SEP 01 2026

Honorable Michelle Bryant-Smith
Chief Administrative Law Judge
Illinois Department of Labor
160 N. LaSalle Street, Suite C-1300
Chicago, IL 60601

60601-311430

