

**STATE OF ILLINOIS - DEPARTMENT OF LABOR**  
**115 S. LASALLE STREET, 37th Floor**  
**CHICAGO, ILLINOIS 60601**

**RECEIVED**

**SEP 08 2026**

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IN THE MATTER OF: )  
)  
PLUMBING CONTRACTORS )  
ASSOCIATION OF GREATER CHICAGO )  
and TERRY PLUMBING )  
)  
Objector(s), )  
)  
v. )  
)  
JANE FLANAGAN, DIRECTOR of the )  
THE ILLINOIS DEPARTMENT OF LABOR, and )  
THE ILLINOIS DEPARTMENT OF LABOR. )  
)  
Respondents. )

State File No.: 2027-H-CC08-2361

**PETITION TO INTERVENE**

Petitioners Donald Finn, a member of the International Brotherhood of Electrical Workers, Local Union No. 134, AFL-CIO, and the International Brotherhood of Electrical Workers, Local Union No. 134, AFL-CIO ("IBEW Local 134"), by and through their attorneys, submit this petition to intervene in all proceedings conducted in the above-captioned matter, and in support of state as follows:

1. Donald Finn ("Finn") is a member and Business Manager/Financial Secretary of IBEW Local 134 and negotiates and enforces collective bargaining agreements on behalf of IBEW Local 134.

2. IBEW Local 134 is a labor organization and affiliate of the International Brotherhood of Electrical Workers representing individuals performing work as Electricians on prevailing

wage schedules to the extent they omit the apprentice Plumber rates established by the Prevailing CBA” (Objections ¶ 14-15).

8. The Department has scheduled the hearing in this matter for September 25, 2026 at 9:30 a.m.

9. Section 120.320(a)(1) of Title 56 of the Illinois Administrative Code states that a party may intervene in a Section 9 hearing in the following circumstances: “(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.”

10. Petitions to Intervene in this matter shall be filed by September 2, 2026.

11. Pursuant to Section 9 of the Act, “any interested objectors may . . . introduce such evidence as is material to the issue.” 820 ILCS 130/9.

12. Section 2 of the Act defines the terms “general prevailing rate of hourly wages”, “general prevailing rate of wages” or “prevailing rate of wages” as,

the hourly cash wages plus *full journeyman* annualized fringe benefits for training and apprenticeship programs registered with the Office of Apprenticeship within the U.S. Department of Labor's Employment and Training Administration with *full journeymen annualized fringe benefits for health and welfare, insurance, vacations and pensions* paid generally, in the locality in which the work is being performed, to employees engaged in work of a similar character on public works. 820 ILCS 130/2 (emphasis added).

14. IBEW Local 134 has long-standing collective bargaining agreements with contractors in Cook County where its members perform work that could conflict with the scope of work of a Plumber and is already covered under the existing Electrician classification.

14. IBEW Local 134 has long-standing collective bargaining agreements with contractors in Cook County where the petition seeks to establish “Plumber Apprentice” rate

Public Act 104-0434, to establish the classification and rate sought by the Objectors. IBEW Local 134 contends that the Objectors are asking the Department to take action that is not authorized under the Act as amended.

20. Accordingly, IBEW Local 134 satisfies Section 120.320(a)(1)(C) because they may be adversely affected by a final order arising from the hearing, they are a necessary party to the hearing proceeding, and claims and defenses and the main action share a common question of law and fact concerning whether the Department has statutory authority to grant the relief requested.

21. Permitting IBEW Local 134 to intervene will not cause undue delay or prejudice and will result in a full and fair resolution of the issues.

WHEREFORE, IBEW Local 134 respectfully requests the Administrative Law Judge to enter an Order granting this Petition to Intervene.

Respectfully submitted,

DONALD FINN, as a Member and Business Manager/Financial Secretary of IBEW Local 134, and the INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION NO. 134, AFL-CIO,

By:   
One of Their Attorneys

Matthew J. Cleveland  
General Counsel  
IBEW, Local No. 134  
2722 S. Dr. Martin Luther King Jr. Drive  
Chicago, Illinois 60616  
Phone: (312) 823-3569  
mcleveland@local134.org

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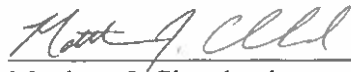
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|---------------------------------------|---|----------------------------------|
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|                                       | ) |                                  |
| PLUMBING CONTRACTORS                  | ) |                                  |
| ASSOCIATION OF GREATER CHICAGO        | ) |                                  |
| and TERRY PLUMBING                    | ) |                                  |
|                                       | ) |                                  |
| Objector(s),                          | ) | State File No.: 2027-H-CC08-2361 |
|                                       | ) |                                  |
| v.                                    | ) |                                  |
|                                       | ) |                                  |
| JANE FLANAGAN, DIRECTOR of the        | ) |                                  |
| THE ILLINOIS DEPARTMENT OF LABOR, and | ) |                                  |
| THE ILLINOIS DEPARTMENT OF LABOR.     | ) |                                  |
|                                       | ) |                                  |
| Respondents.                          | ) |                                  |

**APPEARANCE**

Matthew J. Cleveland will appear on behalf of Donald Finn and the International Brotherhood of Electrical Workers, Local Union No. 134. Matthew J. Cleveland is a member in good standing of the Illinois State Bar, ARDC No. 6255758. Please send all future correspondence to Mr. Cleveland at the following business location:

Matthew J. Cleveland  
General Counsel  
IBEW, Local No. 134  
2722 S. Dr. Martin Luther King Jr. Drive  
Chicago, Illinois 60616  
Phone: (312) 823-3569  
mcleveland@local134.org

We agree to accept service in this matter by electronic mail at the e-mail addresses set forth above. I further affirm and certify that all information provided and the statements made herein are true, correct, and complete.

  
\_\_\_\_\_  
Matthew J. Cleveland  
Attorney for Intervenors

Date: September 2, 2026

**STATE OF ILLINOIS - DEPARTMENT OF LABOR**  
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| THE ILLINOIS DEPARTMENT OF LABOR.     | ) |                                  |
|                                       | ) |                                  |
| Respondents.                          | ) |                                  |

**CERTIFICATE OF SERVICE**

Honorable Michelle Bryant-Smith  
Administrative Law Judge  
Illinois Department of Labor  
115 S. LaSalle Street, 37<sup>th</sup> FL  
Chicago, IL 60601  
[DOL.Hearings@illinois.gov](mailto:DOL.Hearings@illinois.gov)

Jane Flanagan, Director  
Illinois Department of Labor  
115 S. LaSalle Street, 37<sup>th</sup> FL  
Chicago, IL 60601

Stephanie Barton, Esq.  
Deputy General Counsel  
Illinois Department of Labor  
115 S. LaSalle Street, 37<sup>th</sup> FL  
Chicago, IL 60601  
[Stephanie.Barton@illinois.gov](mailto:Stephanie.Barton@illinois.gov)

Christina K. Wernick  
Laner Muchin, Ltd.  
515 North State Street  
Suite 2400  
Chicago, Illinois 60654  
[cwernick@lanerlaw.com](mailto:cwernick@lanerlaw.com)

PLEASE TAKE NOTICE that on this 2nd day of September, 2026, the undersigned provided the above-listed parties copies of the attached *Petition to Intervene* and Appearances electronically where noted.



\_\_\_\_\_  
One of Their Attorneys



**I.B.E.W. LOCAL 134**

2722 S. DR. MARTIN LUTHER KING, JR. DR.  
CHICAGO, ILLINOIS 60616



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Jane Flannigan, Director  
Illinois Department of Labor  
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Chicago, IL 60601

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