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STATE OF ILLINOIS
DEPARTMENT OF LABOR

IN THE MATTER OF:	)	
	)	
ILLINOIS CHAPTER, NATIONAL	)	
ELECTRICAL CONTRACTORS	)	STATE FILE NO. 2027-H-CC08-2368
ASSOCIATION, INC., WEBER ELECTRIC,	)	
INC., WILCOX ELECTRIC & SERVICE, INC.,	)	
F.W. ELECTRIC, INC., GLESCO ELECTRIC,	)	First Amended Objection under 820
INC., REMCO ELECTRICAL CORP., CAMP	)	ILCS 130/4 and 130/9 to the Prevailing
ELECTRIC AND ENGINEERING SERVICES,	)	Wage Schedules Posted July 15 and
P.C., PALS ELECTRIC, INC., and PYRAMID	)	August 15, 2026
ELECTRICAL CONTRACTORS, INC.,	)	
	)	
Objectors,	)	
	)	
v.	)	
	)	
JANE R. FLANAGAN, DIRECTOR of the	)	
ILLINOIS DEPARTMENT OF LABOR, and	)	
THE ILLINOIS DEPARTMENT OF LABOR,	)	
	)	
Respondents.	)	

**FIRST AMENDED WRITTEN OBJECTIONS AND REQUEST FOR HEARING
PURSUANT TO 820 ILCS 130/4 AND 130/9**

Pursuant to Sections 4 and 9 of the Illinois Prevailing Wage Act, 820 ILCS 130/4, 130/9 (the “Act”), and 56 Ill. Adm. Code Part 120, the Illinois Chapter, National Electrical Contractors Association, Inc. (the “Chapter”); Weber Electric, Inc.; Wilcox Electric & Service, Inc.; F. W. Electric, Inc.; Glesco Electric, Inc.; Remco Electrical Corp.; Camp Electric and Engineering Services, P.C.; Pals Electric, Inc.; and Pyramid Electrical Contractors, Inc. (collectively, the “Objectors”), by their undersigned counsel, submit these First Amended Objections to the Illinois Department of Labor’s July 15 and August 15, 2026 prevailing wage determinations.

The Objectors request a hearing, correction of the schedules effective July 15 and August 15, 2026, and consolidation with substantially similar timely objections.

I. OBJECTOR, STANDING, AND TIMELINESS.

1. The Chapter is an employer association and a bargaining party to Inside labor agreements and the South-Central Illinois Telecommunications Agreement and related local wage addenda with Local Unions 146, 193, 197, 309, 538, 601, 649, and 702 of the International Brotherhood of Electrical Workers (collectively, the “CBAs”). Appendix A identifies each local union and the counties and subcounty localities at issue.

2. The contractor Objectors are Chapter members and electrical contractors that bid for and/or perform public works subject to the Illinois Prevailing Wage Act in one or more of the counties or subcounty localities identified in Appendix A. In preparing bids and performing covered work, they must rely upon the Department’s prevailing wage schedules to determine the applicable classifications, wage rates, fringe benefit obligations, and apprentice labor costs under the relevant collective bargaining agreements.

3. Chapter members bid, contract for, and perform public works in each locality identified in Appendix A, employing journeyman wiremen, electronic system technicians, and registered apprentices. Their bidding, payroll, fringe benefit administration, statutory exposure, and competitive position are directly governed by the challenged determinations. The Chapter and its members are persons affected by the determinations within the meaning of Section 9 of the Act.

4. The challenged determinations directly affect the contractor Objectors’ labor-cost calculations, competitive bids, payroll obligations, use of registered apprentices, and compliance responsibilities. Each contractor Objector is therefore a “person affected” by the determinations

within the meaning of 820 ILCS 130/9 and joins in and adopts all grounds, evidence, objections, requests for hearing, and requested relief stated in these Objections.

5. The Department published the challenged schedules on July 15 and August 15, 2026, and the Department's 2026 notice states that objections to the July 15, 2026 rates were due August 14, 2026. The original written Objection was filed within thirty days of publication of the July 15 schedules and this amended objection is filed within thirty days of the August 15 posting and identify the specified grounds and the challenged portions of the schedules as Section 9 requires.

II. THE CHALLENGED DETERMINATIONS.

6. The Objectors challenge every July 15 and August 15, 2026, Electrician and Electronic System Tech and Telecommunications entry listed in Appendix A to the extent the entries state only a journeyman level base wage and fringe components ("rates") and omits the applicable registered apprentice rates reflected in the governing CBA wage schedules.

7. The posted journeyman rates correspond to the CBA wage schedules. Appendix A identifies the corresponding county and regional entries and all posted rates.

8. The same CBAs and wage schedules separately define six apprentice periods for Inside and telecommunications work. The wage schedules assign a distinct base rate to each category and different fringe eligibility and/or contribution amounts for each category. Appendix B provides the apprentice categories and rate evidence local-by-local.

9. None of the challenged schedules include apprentice rates or categories, apprentice base wages, apprentice benefit allocations, or apprentice total rate packages. The schedules also erroneously omit apprentice classifications and progression levels.

10. Local 538's Inside agreement expressly includes all of Vermilion County and the Fountain Creek, Lovejoy, and Prairie Green Townships of Iroquois County. The July 15 and August 15, 2026, Iroquois County schedules do not identify a Local 538 Electrician region for those townships. The Objectors include that omission within this Objection and request that the Department identify the proper locality mapping when it publishes the missing apprentice rates.

III. SPECIFIED GROUNDS FOR OBJECTION.

A. The schedules do not ascertain or publish the CBA classifications and rates that are actually prevailing.

11. Section 4(a) of the Act provides that the prevailing rate shall not be less than the rate that prevails for work of a similar character on public works under qualifying collective bargaining agreements covering each craft or type of worker or mechanic. 820 ILCS 130/4(a). In this regard, the apprentice category rates are not informal discounts from a single journeyman classification, they are contractually-defined worker classifications with specified experience and education prerequisites and distinct wage and benefit treatments.

12. Section 9 requires the Department to investigate and ascertain the prevailing rate of wages for each county during June of each year. Where a determination is based on a collective bargaining agreement, Section 9 further requires the Department to publish increases directly ascertainable from the agreement and provides that "the explanation of classes on the prevailing wage schedule shall be consistent with the classifications established under the collective bargaining agreement." 820 ILCS 130/9.

13. A journeyman prevailing wage schedule that is ascertained for a CBA but which omits apprentice wages and benefits is incomplete, inconsistent with the classifications established under the CBA, and does not comply with the requirements of the Act.

14. These omissions are material because public bodies are required to specify the prevailing rate for each craft or type of worker needed to execute the contract because contractors must pay no less than the specified rates, and because the rates must be posted or supplied to workers. 820 ILCS 130/4(d), (k), (n). By omitting apprentice wages and benefits, a bidder, contractor, public body, apprentice, or compliance auditor cannot determine the applicable apprentice base wage, fringe allocation, category, or total hourly obligation by referring to the Department's published schedules.

B. The July 1, 2026 fringe benefit amendment makes the missing apprentice prevailing rates critical.

15. Effective July 1, 2026, the Act defines the prevailing rate of wages to include hourly cash wages plus full journeyman annualized fringe benefits for registered training and apprenticeship programs and for health and welfare, insurance, vacations, and pensions. 820 ILCS 130/2, as amended by Public Act 104-0017 (House Bill 2488), with implementation set for July 1, 2026, by Public Act 104-0434 (House Bill 1437).

16. The published wage schedules demonstrate why journeyman-only prevailing rates do not satisfy the requirements of the Act. For example, the Local 146 CBA's Inside wage schedules establish first and second classification apprentice base wages of \$25.00 and later classification rates from \$27.50 to \$42.50, while its telecommunications schedule establishes separate prevailing wage bases of \$32.64, \$24.11, \$26.02, \$27.93, \$31.76, and \$33.67. The Local 649 CBA's Inside schedule similarly establishes apprentice bases from \$21.81 to \$46.35 and separate July 1, 2026, prevailing wage bases from \$37.12 to \$49.63, and the Local 702 CBA's Inside schedule establishes base rates from \$27.88 to \$50.18 and July 1, 2026, prevailing wage bases from \$45.39 to \$51.70. These CBAs established the prevailing wage rates for apprentices.

17. Because the amendment requires full journeyman annualized fringes while the CBAs establish different apprentice base wages and benefit participation by apprentice classification, the Department was required to publish ascertainable apprentice schedules. The current schedules do not permit the regulated public to know whether, or how, the Department applied the amendment to apprentices.

C. Directly ascertainable increases must also be published.

18. The successor wage schedules state directly ascertainable increases for Local 309 Inside effective August 31, 2026, Local 309 telecommunications effective September 1, 2026, and Local 702 telecommunications effective September 1, 2026. Section 9 requires increases directly ascertainable from a collective bargaining agreement to be published. Any corrected determination should include those effective date changes, including the apprentice periods and components, without requiring another objection.

IV. EVIDENCE SUPPORTING THE OBJECTION.

19. Appendix B summarizes the wage sheets, two complete Inside agreements, apprentice progression requirements, benefit structures, and NECA prevailing wage sample calculations. The source materials identify the parties, effective dates, classifications, hours and school requirements, base wages, fringe components, and total packages.

20. The complete Local 538 and Local 193 Inside agreements independently confirm that the apprentice classifications are substantive CBA classifications. The Local 538 agreement establishes six categories of apprentices compensated at 50, 50, 60, 65, 75, and 85 percent of the journeyman wireman rate. The Local 193 agreement establishes six categories of apprentices compensated at 45, 45, 50, 60, 75, and 90 percent of the journeyman rate, with school and on-

the-job requirements. Their respective incorporated wage sheets supply the corresponding dollar amounts and benefit allocations.

V. RELIEF REQUESTED.

WHEREFORE, the Objectors respectfully request that the Department:

A. Accept this Objection as timely and find that the Objectors are persons affected with standing;

B. Set a hearing under Sections 4 and 9 of the Act and 56 Ill. Adm. Code Part 120 within the statutory period, on the required written notice;

C. Produce and introduce the investigation, CBA materials, survey data, calculations, assumptions, classification mapping, and other evidence that formed the basis of each challenged entry;

D. Determine, for every Appendix A locality, the apprentice prevailing rates that prevail for Electrician, Telecommunications and Electronic System Tech work;

E. Correct and republish the July 15 and August 15, 2026, schedules and explanations of classes to include the apprentice classifications and components, effective July 15 and August 15, 2026, respectively, together with directly ascertainable successor increases on their contractual effective dates;

F. In the alternative, issue a locality and period specific determination explaining the precise calculation required for each apprentice under the July 1 and August 15, 2026, amendments, including the treatment of cash paid in lieu of fringes;

G. Consolidate this matter with other timely Section 4 or Section 9 objections presenting the same apprentice rate issue, while preserving every locality and classification identified in this Objection; and

H. Grant such further relief as the evidence and the Act warrant.

Respectfully submitted,

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Counsel for Objectors

Dated: August 31, 2026

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

Certificate of Service

Under penalties as provided by law, including pursuant to Section 1-109 of the Code of Civil Procedure, I, Shelby K. Fowler, a non-attorney, affirm, certify or on oath state, that I served a copy of the foregoing First Amended Written Objections and Request for Hearing Pursuant to 820 ILCS 130/4 and 130/9 upon all parties to this case, or their agents appointed to receive service of process, by enclosing a copy of the First Amended Written Objections and Request for Hearing in Case No. 2027-H-CC08-2368 in an envelope addressed to each party or party's agent at their respective address(es) having caused each envelope to be served by via FedEx Priority Overnight service by depositing same in the FedEx drop-off box located at 600 Emerson Road, Creve Coeur, Missouri on August 31, 2026, prior to 4:30 p.m.

Respondents

Illinois Department of Labor and Jane Flanagan, Director
c/o Stephanie Barton, Esq.
Deputy General Counsel
524 S 2nd Street, Ste. 400
Springfield, IL 62701

Shelby K. Fowler
Shelby K. Fowler, Paralegal
Martone Legal, LLC

APPENDIX A
CHALLENGED JULY 15 and AUGUST 15, 2026 ENTRIES

Each entry below is challenged because the posted determination states only journeyman-level components and omits the CBA apprentice classifications and rates. The Objectors also challenge omission of that classification from any locality within the applicable CBA jurisdiction, including the Local 538 Iroquois County townships identified below.

Local / Posted Class	Posted Journeyman Components	County or Subcounty Locality
146 / Electrician	Base \$50.00; foreman \$55.00; H/W \$9.61; pension \$15.00; vacation \$0.00; training \$1.25; other blank; add-OT \$1.37 / \$2.75	Christian, Coles, Cumberland, DeWitt, Macon, Moultrie, Shelby (All); Douglas (S); Effingham and Fayette (N); Montgomery (E); Piatt (SW)
193 / Electrician	Base \$44.89; foreman \$47.39; H/W \$9.75; pension \$13.44; vacation \$0.00; training \$0.40; other blank; add-OT \$1.12 / \$2.24	Cass, Logan, Menard, Morgan, Sangamon, Scott (All); Macoupin (N); Mason (S); Montgomery (NW)
197 / Electrician	Base \$48.00; foreman \$52.80; H/W \$9.45; pension \$15.97; vacation \$0.00; training \$1.00; other blank; add-OT \$0.72 / \$1.44	McLean (W); Woodford (SE)
309 / Electrician	Base \$52.41; foreman \$55.55; H/W \$9.39; pension \$16.01; vacation \$0.00; training \$1.44; other \$3.42; add-OT \$15.12 / \$30.26	Bond and Clinton (W); Macoupin and Madison (SE); Monroe and St. Clair (All); Montgomery (SW); Randolph and Washington (NW)
538 / Electrician	Base \$43.18; foreman \$47.50; H/W \$10.78; pension \$16.00; vacation \$0.00; training \$1.25; other blank; add-OT \$0.64 / \$1.29	Vermilion (All); plus omitted Local 538 mapping for Fountain Creek, Lovejoy, and Prairie Green Townships of Iroquois County
601 / Electrician	Base \$51.07; foreman \$56.18; H/W \$8.85; pension \$13.23; vacation \$0.00; training \$0.77; other blank; add-OT \$1.15 / \$2.29	Champaign and Livingston (All); Douglas (N); Ford, Iroquois, LaSalle (S/SW); Marshall and McLean (E); Piatt and Woodford (NE)
649 / Electrician	Base \$54.53; foreman \$58.28; H/W \$11.60; pension \$16.34; vacation \$0.00; training \$0.27; other \$1.25; add-OT \$0.95 / \$1.91	Calhoun, Greene, Jersey (All); Macoupin (SW); Madison (NW)
702 / Electrician	Base \$55.76; foreman \$59.26; H/W \$11.24; pension \$18.40; vacation \$0.00; training \$1.12; other blank; add-OT \$10.44 / \$20.91	Alexander, Clay, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Jefferson, Johnson, Marion, Massac, Perry, Pope, Pulaski, Saline, Union, Wayne, White, Williamson (All); Bond and Clinton (E); Effingham and Fayette (S); Randolph and Washington (SE)
146 / Electronic System Tech	Base \$39.41; foreman \$42.41; H/W \$9.35; pension \$11.94; vacation \$0.00; training \$0.40; other blank; add-OT \$0.59 / \$1.18	Christian, Coles, Cumberland, Douglas, Macon, Moultrie, Piatt, Shelby (All); Effingham (N); Montgomery (E)

Local / Posted Class	Posted Journeyman Components	County or Subcounty Locality
193 / Electronic System Tech	Base \$39.66; foreman \$42.66; H/W \$8.85; pension \$12.19; vacation \$0.00; training \$0.40; other blank; add-OT \$0.59 / \$1.19	Cass, Logan, Menard, Morgan, Sangamon, Scott (All); Macoupin (N); Mason (S); Montgomery (NW)
197 / Electronic System Tech	Base \$40.63; foreman \$43.63; H/W \$8.85; pension \$11.22; vacation \$0.00; training \$0.40; other blank; add-OT \$0.61 / \$1.22	DeWitt (All); McLean (W)
309 / Electronic System Tech	Base \$41.76; foreman \$44.76; H/W \$4.40; pension \$11.70; vacation \$0.00; training \$0.40; other \$2.00; add-OT \$0.62 / \$1.25	Bond and Clinton (W); Macoupin and Madison (SE); Monroe and St. Clair (All); Montgomery (SW); Randolph (NW)
538 / Electronic System Tech	Base \$40.64; foreman \$43.64; H/W \$8.85; pension \$11.21; vacation \$0.00; training \$0.40; other blank; add-OT \$0.61 / \$1.22	Vermilion (All). No Electronic System Tech entry is posted for Fountain Creek, Lovejoy, or Prairie Green Townships in Iroquois County; that omission is challenged.
601 / Electronic System Tech	Base \$38.34; foreman \$41.34; H/W \$8.85; pension \$13.51; vacation \$0.00; training \$0.40; other blank; add-OT \$0.58 / \$1.15	Champaign and Livingston (All); Ford (S); McLean (E). Additional omissions within Local 601's applicable CBA jurisdiction are challenged.
649 / Electronic System Tech	Base \$38.69; foreman \$41.69; H/W \$11.60; pension \$10.41; vacation \$0.00; training \$0.40; other blank; add-OT \$0.58 / \$1.16	Calhoun, Greene, and Jersey (All); Macoupin (SW); Madison (NW).
702 / Electronic System Tech	Base \$40.28; foreman \$43.28; H/W \$9.86; pension \$10.47; vacation \$0.00; training \$0.40; other blank; add-OT \$5.73 / \$11.48	Alexander, Clay, Edwards, Fayette, Franklin, Gallatin, Hamilton, Hardin, Jackson, Jefferson, Johnson, Marion, Massac, Perry, Pope, Pulaski, Saline, Union, Washington, Wayne, White, Williamson (All); Bond and Clinton (E); Effingham (S); Randolph (SE)

APPENDIX B
CBA-ESTABLISHED APPRENTICE RATES

“P1–P6” denotes the six apprentice classifications in order.

Local / Agreement	Effective	CBA Apprentice Periods and Base Rates
146 / Inside	6/1/26–5/31/27	P1–P6: \$25.00, \$25.00, \$27.50, \$30.00, \$35.00, \$42.50; 50%, 50%, 55%, 60%, 70%, 85%; total packages \$36.30–\$68.33
193 / Inside	6/1/26–11/29/26	P1–P6: \$20.20, \$20.20, \$22.45, \$26.93, \$33.67, \$40.40; 45%, 45%, 50%, 60%, 75%, 90%; total packages \$30.35–\$64.13
197 / Inside	6/1/26–11/30/26	P1–P6: \$21.60, \$24.00, \$26.40, \$31.20, \$36.00, \$40.80; 45%, 50%, 55%, 65%, 75%, 85%; total packages \$33.00–\$66.67
309 / Inside	8/31/26–8/29/27	P1–P6: \$27.48, \$27.48, \$30.22, \$32.97, \$43.96, \$49.46; 50%, 50%, 55%, 60%, 80%, 90%; total packages \$36.19–\$78.53
538 / Inside	6/1/26–11/30/26	P1–P6: \$21.59, \$21.59, \$25.91, \$28.07, \$32.39, \$36.70; 50%, 50%, 60%, 65%, 75%, 85%; total packages \$34.67–\$64.99
601 / Inside	3/1/26–8/31/26	P1–P6: \$22.98, \$25.54, \$28.09, \$33.20, \$38.30, \$43.41; 45%, 50%, 55%, 65%, 75%, 85%; total packages \$33.16–\$66.29
649 / Inside	12/29/25–12/27/26	P1–P6: \$21.81, \$24.54, \$29.99, \$35.44, \$40.90, \$46.35; 40%, 45%, 55%, 65%, 75%, 85%; total packages \$35.72–\$72.81
702 / Inside	6/1/26–12/31/26	P1–P6: \$27.88, \$27.88, \$30.67, \$36.24, \$41.82, \$50.18; 50%, 50%, 55%, 65%, 75%, 90%; total packages \$40.24–\$79.34
146 / Telecom	9/1/25–8/31/26	P1–P6: \$21.68, \$23.65, \$25.62, \$27.59, \$31.53, \$33.50; 55%–85%; packages \$32.40–\$55.40
193 / Telecom	9/1/25–8/31/26	P1–P6: \$21.81, \$23.80, \$25.78, \$27.76, \$31.73, \$33.71; 55%–85%; packages \$32.03–\$55.35
197 / Telecom	9/1/25–8/31/26	P1–P6: \$22.35, \$24.38, \$26.41, \$28.44, \$32.50, \$34.54; 55%–85%; packages \$32.59–\$55.21
309 / Telecom	9/1/26–8/31/27	P1–P6: \$24.24, \$26.45, \$28.65, \$30.86, \$35.26, \$37.47; 55%–85%; packages \$32.58–\$57.56
538 / Telecom (provisional)	9/1/25–8/31/26	P1–P6: \$22.35, \$24.38, \$26.42, \$28.45, \$32.51, \$34.54; 55%, 60%, 65%, 70%, 80%, 85%; total packages \$32.59–\$55.20
601 / Telecom (provisional)	9/1/25–8/31/26	P1–P6: \$21.09, \$23.00, \$24.92, \$26.84, \$30.67, \$32.59; 55%, 60%, 65%, 70%, 80%, 85%; total packages \$31.29–\$55.55

Local / Agreement	Effective	CBA Apprentice Periods and Base Rates
649 / Telecom (provisional)	1/1/26-8/31/26 (H&W increase)	P1-P6: \$21.28, \$23.21, \$25.25, \$27.08, \$30.95, \$32.89; 55%, 60%, 65%, 70%, 80%, 85%; total packages \$34.24-\$55.50
702 / Telecom	9/1/26-8/31/27	P1-P6: \$23.25, \$25.37, \$27.48, \$29.60, \$33.82, \$35.94; 55%-85%; packages \$34.20-\$56.28
193 / Inside successor	11/30/26-5/30/27	P1-P6: \$21.06, \$21.06, \$23.40, \$28.08, \$35.10, \$42.12; 45%, 45%, 50%, 60%, 75%, 90%; total packages \$31.23-\$65.94
538 / Inside successor	12/1/26-5/31/27	P1-P6: \$22.81, \$22.81, \$27.37, \$29.65, \$34.21, \$38.77; 50%, 50%, 60%, 65%, 75%, 85%; total packages \$35.92-67.13

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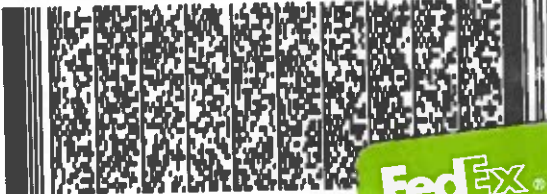
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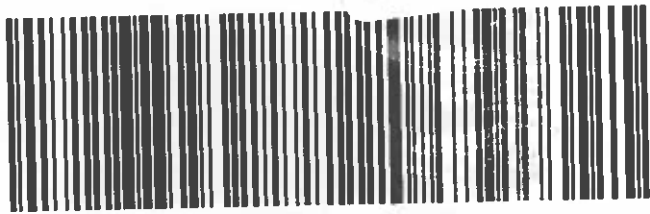
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