

STATE OF ILLINOIS - DEPARTMENT OF LABOR
115 S. LASALLE STREET, 37TH FLOOR
CHICAGO, IL 60603

RECEIVED

SEP 01 2026

IDOL - CHICAGO OFFICE

IN THE MATTER OF:	)	
	)	
NATIONAL ELECTRICAL CONTRACTORS	)	
ASSOCIATION, NORTHERN ILLINOIS	)	
CHAPTER	)	
	)	
Objector(s),	)	State File No.: 2027-H-CC08-2358
	)	
v.	)	
	)	
JANE R. FLANAGAN, DIRECTOR OF THE	)	
ILLINOIS DEPARTMENT OF LABOR, AND	)	
THE ILLINOIS DEPARTMENT OF LABOR	)	
	)	
Respondent(s).	)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that they served the above Petition to Intervene and Appearance on this 31st day of August 2026, by electronic mail and mail where noted to the following:

Emailed and Mailed:

Honorable John A. O'Meara
Administrative Law Judge
Illinois Department of Labor
115 S. LaSalle Street, 37th Floor
Chicago, IL 60603
V: 312-793-1805
Dol.hearings@illinois.gov

National Electrical Contractors Association,
Northern Illinois Chapter,
C/O Christina K. Wernick, Esq.
Laner Muchin, Ltd.
515 North State Street, Suite 2400
Chicago, IL 60654
cwernick@lanerlaw.com

Emailed to the Following:

Illinois Department of Labor and Jane Flanagan,
Director
C/O Stephanie Barton, Esq.
Deputy General Counsel
Illinois Department of Labor
524 S 2nd Street, Ste. 400
Springfield, IL 62701
Stephanie.barton@illinois.gov

By: /s/ Timothy J. Ryan
Attorney for Intervenors

Timothy J. Ryan
ARDC #6337854
Attorney Midwest Region Laborers'
#1 N Old State Capitol Plaza, Ste. 525
Springfield, IL 62701
Email: tryan@midwestlaborers.org
Phone: 309-838-2360

STATE OF ILLINOIS - DEPARTMENT OF LABOR
115 S. LASALLE STREET, 37TH FLOOR
CHICAGO, IL 60603

IN THE MATTER OF:	)	
	)	
NATIONAL ELECTRICAL CONTRACTORS	)	
ASSOCIATION, NORTHERN ILLINOIS	)	
CHAPTER	)	
	)	
Objector(s),	)	State File No.: 2027-H-CC08-2358
	)	
v.	)	
	)	
JANE R. FLANAGAN, DIRECTOR OF THE	)	
ILLINOIS DEPARTMENT OF LABOR, AND	)	
THE ILLINOIS DEPARTMENT OF LABOR	)	
	)	
Respondent(s).	)	

PETITION TO INTERVENE

Comes now Attorney Tim Ryan, Intervener, for the LIUNA Great Plains Laborers District Council and its subsidiary and affiliate local union(s) ("Laborers"), and submit this petition to intervene in all proceedings conducted in the above-captioned matter, and in support of said intervention, state as follows:

1. The Laborers are a labor organization representing individuals performing work as laborers on prevailing wage projects throughout the thirty-five Illinois counties which comprise the Great Plains Laborers District Council, including the Illinois Counties of Winnebago (LIUNA Local 32), Stephenson (LIUNA Local 727), Ogle County (LIUNA Local 727), Lee (LIUNA Local 727), DeKalb (LIUNA Local 32), Jo Daviess (LIUNA Local 727), Carroll (LIUNA Local 727, and Whiteside (LIUNA Local 727).

2. Pursuant to Section 3 of the Illinois Prevailing Wage Act (the "Act"), 820 ILCS 130/3, the general prevailing rate of hourly wages for work of a similar character shall be paid to

all laborers, workers and mechanics engaged in the construction or demolition of public works.

3. On or about August 14, 2026, Objector, submitted a written notice of Objection and Request for Hearing under Sections 4 & 9 of the Prevailing Wage Act "... to clarify the wages so that they are accurately reflected in the wages on the Illinois Department of Labor's website as set forth in the Collective Bargaining Agreements... (Objectors Exh. A Pg. 1). Further, objectors contends that there is an absence of a "C" class for the classification of Communication Technician and Electrician (Objectors Exh. A Pg. 1).

4. Section 20(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."

5. Pursuant to Section 9 of the Act, "any interested objectors may ... introduce such evidence as is material to the issue."

6. In support of the Objector's request, the Objector indicate in their petition that the classification should reflect the Collective Bargaining Agreement that has been signed with the association and the local union (Objector's Exh. A Pg. 1).

7. Laborers' and its subsidiary and affiliate local unions are necessary parties to this hearing because the Laborers are a party to collective bargaining agreements with signatory contractors in the counties referenced in Section 1 above.

8. Because the Laborers perform work within the counties referenced in Section 1 above and if the Objector's written notice of objections is granted in whole or in part, a direct, adverse impact on the Laborers', and its subsidiary and affiliated local unions and their members may occur.

9. It is unclear from the Petition what scope of work the new classification of "C" (Objectors Exh. A Pg. 1).

10. As set forth above, the Laborers' will suffer adverse effects and are a necessary party under the clear intent of the Illinois Prevailing Wage Act and there is a common question of law and fact that must be resolved in order to justly rule on the Petitioner's Petition.

11. Permitting the Laborers' and its subsidiary and affiliate local unions to intervene will not cause undue delay or prejudice in this matter and will result in a full and fair resolution of the issues.

WHEREFORE, the Laborers' and its subsidiary and affiliate local union respectfully request the Administrative Law Judge to enter an Order granting this Laborers' Petition to Intervene.

Respectfully submitted,

The Great Plains Laborers' District Council and its subsidiary and affiliate local unions,

By: /s/ Timothy J. Ryan
Attorney for Intervenors

Timothy J. Ryan
ARDC #6337854
Attorney Midwest Region Laborers'
#1 N Old State Capitol Plaza, Ste. 525
Springfield, IL 62701
Email: tryan@midwestlaborers.org
Phone: 309-838-2360

Extremely Urgent

Use. Reuse. Recycle.

PULL TAB TO OPEN



Visit [UPS.com](https://www.ups.com)

Apply shipping documents on this side.

Scan QR code to
schedule a pickup

Domestic Shipments

- To qualify for the letter rate, UPS Express® envelopes may only contain correspondence, urgent documents, and/or electronic media, and must weigh 8 oz. or less. UPS Express envelopes containing items other than those listed or weighing more than 8oz. will be billed by weight.

International Shipments

- The UPS Express envelope may be used only for documents of no commercial value. Certain countries consider electronic media as documents. Visit [ups.com/importexport](https://www.ups.com/importexport) to verify if your shipment is classified as a document.
- To qualify for the letter rate, the UPS Express envelope must weigh 8 oz. or less. UPS express envelopes weighing more than 8 oz. will be billed by weight.

Note: UPS Express envelopes are not recommended for shipments of electronic media containing sensitive personal information or breakable items. Do not send cash or cash equivalent.

Reusable Express Envelope

Legal Size

Reduce paper waste by using this envelope a second time – either return to sender or with another recipient. See reuse instructions on flap above.

International Shipping Notice — Carriage hereunder may be subject to the rules and other terms and/or conditions established by the Convention for the Uniform Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.



Serving you for more than 110 years
United Parcel Service.®

For information about UPS's privacy practices or to opt out from the sale of personal information, please see the UPS Privacy Notice at www.ups.com 01019511212 05/21 PAC United Parcel Service



100% Recycled fiber
80% Post-Consumer

This envelope is for use with the following services:
UPS Next Day Air®
UPS Worldwide Express®
UPS 2nd Day Air®

Do not use this envelope for:
UPS Ground
UPS Standard
Day Select®
Worldwide Expedited®

SHIP TO:
ILLINOIS DEPARTMENT OF LABOR
37TH FLOOR
115 S LASALLE ST
CHICAGO LOOP IL 60603
IDOL-CHICAGO OFFICE

TIM RYAN
3058392360
LITWIN MIDWEST REGION
1 N OLD STATE CAPITOL PLAZA
SPRINGFIELD IL 62701

LTR

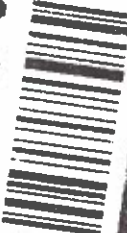
1 OF 1

RECEIVED

SEP 01 2026

IDOL-CHICAGO OFFICE

IL 606 9-02



UPS NEXT DAY AIR SAVER 1P
TRACKING #: 1Z 2TJ D16 13 3936 9242



BILLING: P/P RECEIVED

SEP 01 2026

IDOL-CHICAGO OFFICE

SEP 01 2026



The UPS Store Smart Label
Tracking #
1Z2TJD16133936 9242

RECEIVED

SEP 01 2026

IDOL-CHICAGO OFFICE