

STATE OF ILLINOIS - DEPARTMENT OF LABOR
160 N. LASALLE STREET., STE. C-1300
CHICAGO, IL 60601

IN THE MATTER OF:)
)
ADMINISTRATIVE DISTRICT COUNCIL 1)
OF ILLINOIS OF THE INTERNATIONAL)
UNION OF BRICKLAYERS & ALLIED)
CRAFTWORKERS consisting of its)
ILLINOIS BRICKLAYERS LOCAL UNION)
NOS. 21, 56 AND 74)
Objector(s),) State File No.: 2026-H-RP08-2354
)
v.)
)
JANE R. FLANAGAN, DIRECTOR OF THE)
ILLINOIS DEPARTMENT OF LABOR, AND)
THE ILLINOIS DEPARTMENT OF LABOR)
)
Respondents.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that they served the above Petition to Intervene and Appearance on this 15th day of August 2025, by electronic mail to the following:

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

Stephanie Barton, Esq.
Deputy General Counsel
Illinois Department of Labor
160 N. LaSalle Street, Suite C-1300
Stephanie.barton@illinois.gov

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

David P. Lichtman, Esq.
Barry Bennett
Dowd, Block, Bennett,
Cervone, Auerback & Yokich LLP
8 S. Michigan Ave., 19th Floor
Chicago, IL 60613
dlichtman@laboradvocates.com
bbennett@laboradvocates.com

Terrance B. McGann
McGann, Ketterman, & Rioux
111 East Wacker Drive, Suite 2300
Chicago, IL 60601
tmcgann@mkrlaborlaw.com

James Connolly Jr.
Construction & General Laborers'
District Council of Chicago and Vicinity
999 McClintock Dr., Suite 300
Burr Ridge, IL 60527

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

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PETITION TO INTERVENE

Comes now Attorney Tim Ryan Intervener, LIUNA Great Plains Laborers District Council and its subsidiary and affiliate local union (“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 County of Dekalb (LIUNA Local 32),

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 7, 2025, Objector, Administrative District Council 1 of Illinois of the International Union of Bricklayers & Allied Craftworkers consisting of its Illinois Bricklayers Local Unions 21, 56 and 74 , submitted a written notice of Objection and Request for Hearing under Sections 4 & 9 of the Prevailing Wage Act for the establishment of the Concrete Specialist Welder and Concrete Specialist Non-Welder trade classification in the County listed in Section 1 above, pursuant to Section 9 of the Prevailing Wage Act (820 ILCS 130/4,9).

4. In the section 9 written objection, the Petitioner seeks to establish the trade classification of Concrete Specialist Welder and Concrete Specialist Non-Welder as reflected in the submitted Collective Bargaining Agreement (Objections Page 1).

5. 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.”

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

7. In support of the Petitioner’s request, the Petitioners indicate in their petition that the classification should reflect the Collective Bargaining Agreement that has been signed with the various associations.

8. In the county listed in Section 1 above, the Petitioner in their Petition to support their request states that the signed Collective Bargaining Agreement reflects the trade classification of

Concrete Specialist Welder and Concrete Specialist Non-Welder which was omitted from the Departments website (Objections Page 2).

9. 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 county referenced in Section 1 above.

10. Because the Laborers perform work within the county 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.

11. It is unclear from the Petition what scope of work the new classification of Concrete Specialist Welder will cover.

12. It is unclear from the Petition what scope of work the new classification of Concrete Specialist Welder will cover.

13. 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.

14. 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 union,

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