

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

IN THE MATTER OF:

ADMINISTRATIVE DISTRICT COUNCIL 1 OF)
ILLINOIS OF THE INTERNATIONAL UNION)
OF BRICKLAYERS AND ALLIED)
CRAFTWORKERS, consisting of its ILLINOIS)
BRICKLAYERS LOCAL UNION NOS.)
21, 56, and 74.)

Petitioner,)

vs.)

State File No. 2026-H-RP08-2354

JANE FLANAGAN, DIRECTOR OF THE)
ILLINOIS DEPARTMENT OF LABOR and)
the ILLINOIS DEPARTMENT OF LABOR,)

Respondents.)

NOTICE OF FILING

Please take notice that on this 14th day of August, 2025 the undersigned filed the attached Petition to Intervene, a copy of which is herewith served upon you and has been sent via email and overnight mail.

Respectfully Submitted,

By: /s/ Terrance B. McGann

Mid-America Carpenter Regional Council

Terrance B. McGann
McGann, Kettermann, & Rioux
111 East Wacker Drive, Suite 2300
Chicago, IL 60601
(312) 251-9700
tmcgann@mkrlaborlaw.com

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

IN THE MATTER OF:

ADMINISTRATIVE DISTRICT COUNCIL 1 OF)
ILLINOIS OF THE INTERNATIONAL UNION)
OF BRICKLAYERS AND ALLIED)
CRAFTWORKERS, consisting of its ILLINOIS)
BRICKLAYERS LOCAL UNION NOS.)
21, 56, and 74.)

Petitioner,)

vs.)

State File No. 2026-H-RP08-2354

JANE FLANAGAN, DIRECTOR OF THE)
ILLINOIS DEPARTMENT OF LABOR and)
the ILLINOIS DEPARTMENT OF LABOR,)

Respondents.)

MID-AMERICA CARPENTERS REGIONAL COUNCIL'S PETITION TO INTERVENE

Come now Attorneys Terrance B. McGann and Karen M. Rioux on behalf of Petitioner, Mid-America Carpenters Regional Council ("MACRC") and its affiliated local unions, 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. MACRC is a labor organization representing individuals performing work as carpenters on prevailing wage projects throughout all counties in Illinois, including Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will Counties.

3. On or about August 7, 2025 Petitioner, Administrative District Council 1 of Illinois of the International Union of Bricklayers and Allied Craftworkers, consisting of its Illinois

Bricklayers Local Union Nos. 21, 56, and 74 Council (“Bricklayers”), submitted a written notice of Objection and Request for Hearing under Sections 4 & 9 of the Prevailing Wage Act to establish the prevailing wage rate for new trade classifications of Concrete Specialist Welder and Concrete Specialist Non-Welder (the “Affected Classifications”) in Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will Counties (the “Affected Counties”).

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 its Objection and request to establish two new classifications, the Bricklayers indicate that their Collective Bargaining Agreement establishes the prevailing rate for Concrete Specialist Work and for employees in the classifications called Concrete Specialist Welder and Concrete Specialist Non-Welder.

7. MACRC and its affiliated local unions are necessary parties to this hearing because MACRC is a party to collective bargaining agreements in the Affected Counties that cover the work of Concrete Specialist Welder and Concrete Non-Welder and may be adversely impacted by any decision regarding the Bricklayers petition.

8. Because members of MACRC perform the work of Concrete Specialist Welder and Concrete Non-Welder within the Affected Counties, any order entered in the Bricklayers’ petition

for the new classifications will have a direct and adverse impact on MACRC, its affiliated local unions and its members.

11. As set forth above, MACRC and its affiliated local unions 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 Bricklayers Petition.

12. Permitting MACRC and its affiliated 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.

Respectfully Submitted,

Mid-America Carpenters Regional Council

By: /s/ Terrance B. McGann
One of its attorneys

Terrance B. McGann
Karen M. Rioux
McGann, Ketterman, & Rioux
111 East Wacker Drive, Suite 2300
Chicago, IL 60601
(312) 251-9700
tmcgann@mkrlaborlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that they served the above Petition to Intervene on this 14th day of August 2025, via overnight mail and electronic mail to the following:

Jane R. Flanagan
Director of Labor
Illinois Department of Labor
160 N. LaSalle St., Ste.C-1300
Chicago, IL 60601
Jane.Flanagan@illinois.gov

David P. Lichtman Esq.
Dowd, Bloch, Bennett,
Cervone, Auerback & Yokich, LLP
8 S. Michigan Avenue 19th Floor
Chicago, IL 60613
DLichtman@laboradvocates.com

Stephanie Barton Esq.
Deputy General Counsel
Illinois Department of Labor
524 S 2nd Street Ste 400
Springfield, IL 62701
Stephanie.Barton@Illinois.gov

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