



Foundation Action

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of the National Right to Work
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Foundation to Trump Labor Board: Repeal Obama NLRB Ambush Election Scheme

Comments call for new protections for workers trapped in unions they oppose

WASHINGTON, DC – On the very day the third Trump-appointed Member of the five-person National Labor Relations Board (NLRB) was sworn in, the National Right to Work Legal Defense Foundation filed comments asking the Labor Board to repeal the 2014 “Ambush Election” Rule pushed through by the Obama NLRB in 2014.

The Foundation’s comments not only call for the 2014 changes to be rescinded, but ask the Board to adopt new protections for workers suffering under union monopoly representation they oppose. In addition to changes to the decertification system that allows workers to vote out an unwanted union, the comments call on the NLRB to use the powers granted to it by Congress to force union officials to recertify that at least a majority of workers support unionization.

Obama Board Issued Rule to Assist Union Organizing

After Big Labor failed to pass the Card Check Forced Unionism Bill through Congress in 2010, union officials turned to the NLRB to change union election rules so they could expand their forced-dues ranks. The Obama-stacked NLRB was so eager to assist Big Labor, its initial attempt to implement a new election rule – effectively “card check lite” – was overturned in federal court because the NLRB failed to follow basic procedures.



The Foundation and thousands of Right to Work supporters have asked the Trump NLRB to repeal the Obama Labor Board’s “Ambush Election” scheme.

Eventually though, the Obama Labor Board adopted what is now known as the “Ambush Election Rule” in 2014. The one-sided rule aids union campaigns to expand their forced-dues ranks by dramatically shortening the time frame individual workers have to gather, evaluate, and share information with their coworkers about the negative effects of unionization.

By allowing union organizers to spring an election on workers in a matter of days, unions seek to deny workers information about the downsides of bringing an outside union into their workplace. Moreover, the rules also require job providers to disclose workers’ personal information (including their phone numbers, email

addresses, and shift information), thus opening up dissenting or undecided workers to intimidation and harassment.

“The Obama NLRB’s election rules make union organizing campaigns more one-sided and stifle the rights of employees opposed to unionization. It is long past time they be rescinded” said Ray LaJeunesse, Vice President and Legal Director of the National Right to Work Foundation. “However, simply reverting to the pre-Obama NLRB rules would still leave many workers – whose rights the NLRB is supposed to protect – trapped in unions they oppose and for which a majority of their coworkers have never voted.”

In December, with the votes of two new Trump appointees, the NLRB announced it would seek

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After More Than Twenty-Eight Years of Litigation, Independent-Minded Workers Prevail

Foundation-assisted couple forces union to settle case over illegally seized dues

GREEN BAY, WI – The day before the Berlin Wall fell in November 1989, Sherry and David Pirlott filed federal unfair labor practice charges against the Teamsters Local 75 union hierarchy for keeping them in the dark about their rights and how union officials were spending their forced union dues.

Following nearly three decades of litigation between National Right to Work Foundation staff attorneys and union lawyers at both the National Labor Relations Board (NLRB) and Court of Appeals for the D.C. Circuit, the Pirlotts' rights were finally vindicated.

Former Steward Stood up to Corruption, Intimidation

Before the legal battle began, Sherry Pirlott was a Teamsters Local 75 union steward at the Schreiber Foods cheese company.

"It was very clear from the beginning that the other union stewards did things for the betterment of the union, not for the betterment of the workers," she later recounted. "I just did what I thought was right, and the other stewards

Sherry and David Pirlott filed charges against union officials on November 8, 1989 - the day before the Berlin Wall began to be demolished - but enforcing their rights would take longer than tearing down one of the most visible symbols of the Cold War.

didn't like that one bit."

After union goons threatened her with bodily harm for refusing to toe the line, Sherry decided to stop financially supporting the union hierarchy. Teamster Local 75 union officials then sued her in small-claims court to force her to pay for union activities. Unable to find a local attorney in Green Bay willing to take on union lawyers, she was forced to defend herself. The judge refused to hear her arguments and quickly awarded judgment to the Teamsters.

That's when Sherry discovered the National Right to Work Foundation's free legal aid program – and learned about her rights under a United States Supreme Court decision



Foundation staff attorneys had just won.

Foundation-Won *Beck* Precedent Requires Disclosure

In the Foundation-won *Communications Workers v. Beck* ruling, the U.S. Supreme Court held in 1988 that workers have the right to refrain from joining a union and subsidizing union activities unrelated to monopoly bargaining and contract administration, such as politics and member-only events.

Teamsters Local 75 union officials never informed the Pirlotts or their coworkers of their rights under *Beck*. Once they learned of these rights, Sherry and David Pirlott, also an employee at Schreiber Foods, resigned from formal union membership and objected to paying for nonchargeable union expenses. Providing only sketchy financial disclosure of the union's expenses, Teamster union officials told the Pirlotts that only 1.1 percent of the union's expenditures were for non-bargaining activities.

On November 8, 1989, with free legal aid from Foundation staff

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The Foundation is a nonprofit, charitable organization providing free legal aid to employees whose human or civil rights have been violated by abuses of compulsory unionism. All contributions to the Foundation are tax deductible under Section 501(c)(3) of the Internal Revenue Code.

Foundation Requests Investigation of Labor Board Official for Biased Leaks

NLRB official's one-sided recusal standard used to protect Obama NLRB precedents

WASHINGTON, DC – In March, the National Right to Work Legal Defense Foundation formally requested an investigation of the Inspector General of the National Labor Relations Board (NLRB) for misconduct in finding that a Trump-selected Board Member should be barred from participating in votes to overturn a controversial decision issued by the Obama Labor Board.

The push for recusals, aided by the questionable opinions offered by the Labor Board's "watchdog" official, are part of an ongoing attempt to deny the NLRB the three votes needed to overturn numerous Obama-era Board precedents that tilted the playing field even more in favor of forced unionization. Big Labor allies in Congress immediately seized on the opinions, which were leaked in their entirety to the press, to argue new Board Members appointed by the President should be barred from participating in numerous cases.

Because by tradition the NLRB consists of three Members of the President's party and two from the other party, the inability of one Trump appointee to participate would mean the two Obama era holdovers would always have the votes to block any attempt to overturn precedents issued by the Obama NLRB majority.

With more than eighty ongoing NLRB cases in which Foundation staff attorneys represent workers, recusals based on biased findings by the Inspector General could limit attempts to protect workers opposed to forced unionization.

The Foundation's complaint was filed with the Integrity Committee of the Council of Inspectors General on Integrity and Efficiency (CIGIE), which reviews and refers for investigation misconduct allegations against Inspectors General. In its complaint, the Foundation pointed to the fact that the two reports NLRB

The NLRB's "watchdog" has relied on dubious logic to make a Trump appointee step aside from a major case but looked the other way at Obama appointee Craig Becker's obvious conflicts of interest as a former SEIU lawyer.

Inspector General David Berry issued claiming that Trump appointee William Emanuel should

not participate in overruling an Obama Board decision were made public without required redactions of the NLRB's internal deliberative communications. The Integrity Committee should review the complaint to determine whether and where to refer it for investigation.

As the complaint notes, in 2012 then NLRB Member Terrence Flynn resigned after Inspector General Berry issued a report that Flynn had violated Executive Branch ethical standards by sharing information with a former Member regarding the Board's deliberative processes. The Foundation's complaint alleges that IG Berry has committed the same ethical violation in his reports about Member Emanuel and by earlier improperly disclosing to persons outside the NLRB that he was investigating Member Emanuel. The complaint asks the Integrity Committee to refer the matter for investigation.

IG Under Fire for Recusal Double Standard

Berry has also come under fire for the dubious logic of his claim that Emanuel should recuse himself because he had a conflict of interest. Previously, Berry had looked the other way when former SEIU lawyer Craig Becker refused to recuse himself from cases involving



SEIU affiliates when Becker was an Obama recess appointee to the Board.

In addition to its complaint to the CIGIE, the Foundation also filed a Freedom of Information Act request (FOIA) seeking documents related to the leak and additional evidence of Berry's recusal double standard.

"Victims of compulsory unionism abuses should not be victimized yet again by rogue bureaucrats at the NLRB," National Right to Work Foundation President Mark Mix told reporters when the CIGIE complaint was filed. "Whether regarding recusals or the disclosure of internal Board deliberations, Inspector General Berry appears to apply different standards to different people."

"Despite his tenuous findings regarding recusals for Member Emanuel, just a few years ago Berry gave the green light to Obama appointee and former Service Employees International Union lawyer Craig Becker to participate in cases involving the SEIU's affiliates," added Mix. "Now both Berry and pro-forced unionism NLRB Member Pearce appear to have publicly disclosed information regarding the Board's internal deliberative process, even though Berry's own report in 2012 condemned former Member Flynn for doing the same thing." ❖

Michigan Supreme Court Upholds Ruling to Strike Down Teacher Union “Window Periods”

Decision affirms the right of Michigan teachers and other civil servants to leave a union at any time

LANSING, MI – In March, the Michigan Supreme Court denied an appeal by Michigan Education Association (MEA) union lawyers of a lower court ruling that affirmed Michigan employees’ right to leave a union at the time of their choosing. National Right to Work Legal Defense Foundation staff attorneys provided free legal assistance to several public school employees in the case.

Since Michigan’s Right to Work Law took effect in 2013, Foundation staff attorneys have actively challenged union officials’ schemes to stonewall independent-minded workers attempting to exercise their lawful rights. To date, over 40 cases have been brought by Foundation attorneys to enforce Michigan employees’ Right to Work protections.

“As our enforcement activities in Michigan demonstrate, without vigorous enforcement, state Right to Work laws will be hollowed out by scowling union bosses,” said Ray LaJeunesse, Vice President and Legal Director of the Foundation.

School Employees Fight Back

Battle Creek Public Schools employee Alpha Snyder resigned her union membership in April 2013, after the pre-existing monopoly bargaining agreement expired and she became fully covered by Michigan’s public sector Right to Work law. However, MEA union officials insisted that she could only leave the union during an annual 30 day “window period” in August. Throughout the fall of 2013, Snyder received several demands for forced dues from MEA bosses.

Mark Norgan, a Standish-Sterling Community Schools employee, resigned his union membership in October 2013. Because he was still under a monopoly bargaining contract until June 30, 2015, he



Union bosses still flout Michigan’s Right to Work Law, which passed in 2012 after voters rejected United Autoworkers (UAW) union chief Bob King’s ballot measure to make forced union dues mandatory under the Michigan State Constitution.

asked to pay only the part of dues he was forced to pay as a condition of employment as was his right under the Foundation-won Supreme Court case *Chicago Teachers Union v. Hudson*. MEA union officials told him that he could only leave the union during the annual 30 day window period.

In November 2013, Grand Blanc Community Schools employee Mary Carr resigned her union membership as soon as she became fully covered by Michigan’s Right to Work Law. However, MEA officials informed Carr that her resignation could not be effective until the following August. Union officials then sent multiple demands for forced dues, and eventually threatened Carr that if she did not pay the forced dues, they would dispatch debt collectors.

With free legal aid from Foundation staff attorneys, the three public school employees filed unfair labor practice charges with the Michigan Employment Relations Commission (MERC) against the MEA in the spring of 2014. In September 2014, an

administrative law judge struck down the “window period” scheme, and the full commission agreed in February 2016. The commission also held that a union’s threats to use a debt collector to collect dues after resignation would be illegal in the future.

MEA appealed MERC’s ruling to the Michigan Court of Appeals, which in May 2017 affirmed the right of Michigan teachers and public employees to leave a union and stop paying union dues at any time. Finally, this March, the Michigan Supreme Court rejected MEA’s appeal of that ruling.

“Right to Work laws simply protect an employee’s right to decide for him or herself whether to join and financially support a union, and now Michigan’s courts have made it clear that freedom of choice cannot be limited to one month a year,” said LaJeunesse. “Hopefully Michigan unions now will focus on gaining the voluntary support of workers instead of attempting to trap them in unions with schemes like arbitrary window periods.” ✚

Make An IRA Gift Today

Now that tax season is behind us, a number of generous donors to the National Right to Work Legal Defense Foundation are looking for ways to limit their tax hit for 2018. One way to contribute to the work of the Foundation while lowering your taxable income for 2018 is to take advantage of the Charitable IRA provision. If you are 70 ½ years old or older, you may instruct your IRA custodian to transfer any amount from

your IRA, up to \$100,000, directly to the National Right to Work Legal Defense Foundation. This distribution would not be included in your table income for 2018.

Please consider an IRA gift to the Foundation that would fulfill any required minimum distribution requirements. This IRA gift would not produce an income tax deduction and can be made right now.

If you have any questions regarding an IRA Gift please contact Ginny Smith by email at gms@nrtw.org or by calling at 1-800-336-3600.

Independent-Minded Workers Prevail in Decades-Long Fight Over Illegal Dues

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attorneys, the Pirlotts filed unfair labor practice charges with the NLRB. Nearly two years later, the NLRB General Counsel found merit to the charges and issued a complaint against the union for failing to inform workers of their *Beck* rights, providing inadequate financial disclosure, and charging objecting workers for expenditures incurred beyond their own bargaining unit.

Labor Board Bureaucrats Drag Feet for Years

In 1992, an administrative law judge issued a mixed ruling, and both the Pirlotts and the union appealed to the full NLRB. That's when the outrageous delays began.

After more than six years of inaction by Bill Clinton's NLRB, Foundation staff attorneys filed a rare mandamus petition in the U.S. Court of Appeals for the D.C. Circuit to order the Board to issue a decision. Under mounting pressure from this legal action, the Clinton Labor Board finally acted on the case in September 1999. However, they simply sent the case back to an administrative law judge to determine whether the union could force the Pirlotts to pay for union organizing at other workplaces.

In the Foundation-won Supreme

Court precedent *Ellis v. Railway Clerks*, the U.S. Supreme Court ruled that such expenses are not chargeable to non-members under the Railway Labor Act. Unfortunately, even though in *Beck* the Court ruled that the Railway Labor Act and the National Labor Relations Act are "statutory equivalents," the judge in December 2001 ruled that Teamster union bosses could charge the Pirlotts to subsidize union organizing campaigns anywhere in the private sector.

The Pirlotts again appealed to the full NLRB. With no decision for four and a half years, Foundation staff attorneys filed a second mandamus petition and successfully convinced the D.C. Circuit to order the NLRB to respond in 2006. Unable to meet the November 30 deadline, the NLRB asked the D.C. Circuit for more time. When the NLRB finally issued a decision two months later, it failed to hold all union organizing expenditures nonchargeable under *Ellis* and *Beck*. Moreover, the Board overlooked the inadequacy of the union's financial disclosure, so the Pirlotts appealed the decision to the D.C. Circuit.

On April 18, 2008, the D.C. Circuit issued its ruling. It declined to address the argument that objecting non-members can never be charged for organizing activities

and remanded the case back to the NLRB to consider the adequacy of the union's financial disclosure. The NLRB then sat on the case for the next seven years with little action.

The NLRB in March 2017 finally held that the Teamsters Local 75 union officials provided insufficient financial disclosure. Following this victory for the Pirlotts, settlement negotiations dragged on for nearly another year. Eventually, after Wisconsin's Right to Work Law became operative at Schreiber Foods in January 2018, the union agreed to reimburse the Pirlotts with interest and post notices informing workers of their rights under *Beck*. Further, because of Wisconsin's Right to Work Law, David Pirlott, who still works at Schreiber Foods, is finally free from any payments to the union bosses that fought to violate his rights for decades.

"With the help of NLRB bureaucrats, Teamster union bosses fought tooth and nail for nearly three decades to try to keep every last cent of the Pirlotts' forced fees," said National Right to Work Foundation President Mark Mix. "The Pirlotts' lengthy legal battle to enforce their rights despite the NLRB's repeated delays demonstrates that Right to Work laws are the only way to truly protect independent-minded workers." ✚

Stage Set for Next Supreme Court Showdown Against Government Union Bosses Following *Janus*

U.S. Supreme Court asks union lawyers to file response in case brought by Foundation Staff attorneys

WASHINGTON, DC – As the nation awaits a ruling by the United States Supreme Court in the National Right to Work Foundation's *Janus v. AFSCME* case, the Court has asked union lawyers to respond to a petition filed by Foundation staff attorneys for home care providers seeking a refund of more than \$30 million in forced union payments.

Earlier this year, Foundation staff attorneys filed a petition for certiorari with the Supreme Court asking it to take up *Riffey v. Rauner*, a continuation of the Foundation-won *Harris v. Quinn* case.

\$30 Million in Illegally Seized Union Dues at Stake

In *Harris*, the Court struck down an Illinois scheme that classified more than 80,000 individuals who receive state subsidies to provide in-home care to disabled persons as “public employees” solely for the purpose of being unionized and required to pay union fees.

The 2014 decision held that the forced-dues scheme violated the First Amendment rights of in-home care providers. *Janus*, which Foundation staff attorneys argued at the High Court in February, seeks to strike down forced dues for all government workers nationwide.

If the Court decides to hear *Riffey*, the nine Justices will consider whether independent-minded care providers are entitled to a refund of the tens of millions of dollars the Service Employees International Union (SEIU) hierarchy seized from them through the scheme struck down in *Harris*.

“By asking SEIU union lawyers to respond to the care providers’ petition, the Supreme Court has indicated it is interested in this critical issue,” said Foundation Vice President Patrick Semmens. “Given that the Court only hears argument in about 80 cases each year, the fact



Foundation staff attorneys aim to be back at the U.S. Supreme Court to enforce and expand the *Harris v. Quinn* precedent that won protections for in-home care providers like Susie Watts by making it clear that union officials must receive consent before seizing any union dues.

that Foundation staff attorneys are awaiting a decision in one case and could soon have their nineteenth case at the Court is a testament to the Foundation’s strategic litigation program.”

Justices Demand Response from SEIU Lawyers

In addition to seeking a refund for victimized in-home care providers, Foundation staff attorneys in *Riffey* ask the Court to establish that in-home care providers cannot be required to take affirmative steps to exercise their right under *Harris* to refrain from subsidizing union speech.

Foundation staff attorneys have also raised the issue of affirmative consent and union opt-out requirements in *Hamidi v. SEIU*, a class-action lawsuit currently pending at the United States Court of Appeals for the Ninth Circuit. If

the Court does not decide the issue in *Janus* or *Riffey*, the *Hamidi* case could put the question before the Court.

This argument builds upon the Foundation-won 2012 decision in *Knox v. SEIU*. In *Knox*, the High Court held for the first time that a union should not have collected dues for a political spending campaign without first obtaining non-members’ consent. Although that decision dealt with a special assessment levied by SEIU bosses to fund what they called a “Political Fight-Back Fund,” the *Hamidi* case seeks to apply that standard to all dues collected from public employees.

The SEIU’s opt-out process at issue in *Hamidi* demonstrates the problems with the current opt-out framework. Although union bosses are required to provide employees notices informing them of their right to opt-out of paying for union

Trump Labor Board Considering Overturning Ambush Election Scheme

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public input on the possibility of rescinding or otherwise modifying the 2014 rule. In its comments, the National Right to Work Foundation not only renewed its opposition to the Obama NLRB's changes, but suggested other specific ways that the NLRB could protect workers from forced unionization.

New Board Re-Evaluates 2014 Election Changes

As noted in its filing, Foundation staff attorneys currently represent employees in over 80 cases at the NLRB, including many where workers have been blocked from even having a vote to remove a union that they believe lacks the support of a majority of employees. The Foundation's experience in assisting workers in clearing the legal barriers to holding a vote to remove an unwanted union led it to suggest significant reforms to the union decertification process.

Specifically, the comments call for the elimination of various "election bars" created over the years by NLRB bureaucrats, even though they are not mandated by the National Labor Relations Act (NLRA) which the Board is charged with enforcing. Also, the Foundation called on the NLRB to end union officials' ability to abuse the NLRB system by filing blocking charges to stop workers from having decertification votes, frequently just so unions can continue to collect forced dues from workers who, if allowed to vote, would free themselves from union ranks.

"Currently the one-sided NLRB election system lets union organizers call for a unionization vote of non-union employees at any time, but forces workers to wait months or even years to file to get a secret ballot vote on an incumbent union," said LaJeunesse. "If the new Trump Board wants to demonstrate it isn't a rubberstamp for Big Labor



Ray LaJeunesse, Jr., Vice President and Legal Director of the National Right to Work Legal Defense Foundation, testified in Congress about the dangers of the Obama NLRB's "Ambush Election Rule."

like the Obama NLRB, this would be a good place to start."

NLRB Should Adopt Limited Life for Union Certification

The comments also call on the newly constituted five member NLRB to require unions to regularly recertify that they have the support of at least a majority of workers or else lose their powerful status under the NLRA as the monopoly "representative" of all workers in a workplace, including those who prefer a different union or no union at all.

"If union officials are going to be granted monopoly powers over every employee in a workplace, they should be required to regularly recertify that at least a majority actually wants them there," continued LaJeunesse. "It is outrageous that under current rules a worker can remain trapped paying fees to a union, even though not a single one of their coworkers ever voted for their workplace to be unionized."

A recertification requirement could be achieved by making union certifications as the monopoly bargaining agent expire regularly,

absent new proof that enough workers actually want to be under a union monopoly. To demonstrate the need for such reforms, in its comments the Foundation cites a recent study that found that 94 percent of workers currently under union monopoly representation have never even voted on that union in an NLRB secret ballot election.

"Just as no elected public official enjoys life tenure on the basis of winning one election, no union should maintain [their] extraordinary powers... on the basis of just one election..." the Foundation told the NLRB in its comments. "Today, many workplaces unionized decades ago consist primarily, if not entirely, of workers hired long after any 'choice' was made to organize." ✚



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Foundation Lawsuits Challenging Union 'Opt-Out' Policies Advancing Toward Supreme Court

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politics, several of the lawsuit's plaintiffs never received such notices. Others were only notified after a union-designated window period for objecting to the payment of full dues had already expired.

Cases Seek to Settle Key Opt-In/Opt-Out Issue

Moreover, independent-minded civil servants who received the notice found that it downplayed employees' rights to opt-out. Information about refraining from paying dues for union politics was printed in small text and placed below the union's more prominent pitch for full membership. Those employees who were able to decipher the union's explanation of their rights then had to undergo an onerous, bureaucratic process to reclaim their forced fees.

"If the First Amendment prohibits the government from forcing individuals to pay any union fees, it stands to reason that the First Amendment is violated when union bosses take workers' money without their consent," continued Semmens. "Workers' constitutional rights should never be limited by burdensome opt-out procedures set up by dues-hungry union bosses."✠

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Message from Mark Mix

President
National Right to Work
Legal Defense Foundation

Dear Foundation Supporter:

The eyes of the nation are on the *Janus v. AFSCME* case, as National Right to Work Legal Defense Foundation attorneys await a Supreme Court decision that will have an enormous impact on the rights of every teacher, police officer, and other civil servant across the nation.

However, the Foundation's strategic litigation program does not hinge on just one high-profile case. As you will read in this issue of *Foundation Action*, Foundation staff attorneys have many other cases in the pipeline for independent-minded workers fighting to free themselves from forced unionism.

Indeed, Foundation staff attorneys currently represent workers in over 80 cases pending just at the National Labor Relations Board (NLRB). We have scores more in other venues across the country.

These scores of cases include opportunities to repeal Obama-era decisions that expanded the power union bosses wield over the rank-and-file. But we must also fight back against underhanded efforts by Obama holdovers and biased bureaucrats to block the expansion of worker freedom.

Not every case will make the nightly news, but every one of the thousands of smaller victories – from helping Michigan teachers exercise their right to resign from union membership at any time to assisting Sherry and David Pirlott win back illegal forced dues after a 28-year battle – attacks the injustice of forced unionism in its own way.

We fight Big Labor's compulsory-unionism power on multiple fronts, and we're in the battle for the long haul. This is all made possible through the generosity of the Foundation's supporters like you.

Sincerely,

Mark Mix