

PELETTIERI RABSTEIN & ALTMAN

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May 10, 2024

Via Regular Mail

Jeffrey Schwab, Senior Counsel
Liberty Justice Center
440 North Wells Street, Suite 200
Chicago, IL 60654

**RE: Plumbers and Pipefitters Local 9
Nicolo Giangrasso**

Dear Mr. Schwab:

The undersigned is counsel for Plumbers and Pipefitters UA Local 9 ("Local 9"). I received your May 2, 2024 letter to Michael Maloney, Local 9's Business Manager.

For the record, there are material factual inaccuracies concerning Mr. Giangrasso in your letter, which inaccuracies I have not corrected herein. Hopefully, however, Mr. Giangrasso told you that prior to his employment by Hamilton Township School District, he was a member of Local 9 for approximately four years before being re-initiated in 2013.

Local 9 is well aware of Janus, the facts of which are materially different from the circumstances of your client. For example, the deductions of which you speak are not the dues addressed in Janus. Rather, here they are assessments, and it cannot reasonably be alleged that Mr. Giangrasso's First Amendment rights under Janus are implicated by such assessments deducted by his employer. Also, the relationship between Local 9 and the School District in Mr.

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Giangrasso's case is analogous to that of employment agency vendor and customer, which relationship, indisputably, was not addressed by the Supreme Court in Janus.

The situation here not being on all fours with Janus, Local 9 declines to comply with your requests.

If you wish to discuss this matter, please email me at awatson@pralaw.com to schedule a time to speak or call me directly at 609-520-0900.

Very truly yours,
PELETTIERI, RABSTEIN & ALTMAN



ANDREW L. WATSON, ESQUIRE

ALW:jmj

cc: Michael Maloney, Business Manager, Plumbers and Pipefitters Local 9,
via electronic mail