

October 14, 2024

Via Certified Mail & Email

Robert E. Bloch



RE: Cease and Desist Retaliation Against CTU Members

Mr. Bloch:

As you know, we are pro bono counsel to several members of the Chicago Teachers Union (CTU) seeking enforcement of CTU's obligation to publish annual financial audits to its members.

When we first wrote to your clients on October 2, we extended the opportunity to avoid litigation by publishing the audits to members, consistent with CTU's Constitution. One week later, you requested the names of our clients, ostensibly to confirm their membership. As a professional courtesy, we complied.

The retaliation from CTU against our clients was swift. That evening—during a delegate meeting where one of our clients was introduced as a candidate for the Pension Board—CTU's President attacked our clients by name, associating them with "Project 2025" and baselessly labeling them as "extreme right wing." Most concerning, it is our understanding from a whistleblower that, on Friday, one of our client's in-school union reps received an "apoplectic" call from someone at CTU insisting that they try to stop our client from pursuing this lawsuit. If true, this represents a drastic escalation of CTU's intimidation tactics.

These retaliatory efforts not only run counter to CTU's expressed principles of democracy and solidarity—they also represent independent actionable violations of CTU's Constitution. Specifically, these actions violate Article XIII, Sections 2, 4, and 5 of the CTU Constitution, which require equitable treatment of members, prohibit discrimination based on perceived political or economic beliefs, and require "maintenance of the democratic processes."¹ Your clients must cease and desist

¹ **Sec. 2:** The Union shall not take any action affecting a particular group of its members without the advice and counsel of that group.

these and any other retaliatory efforts. We reserve our right to amend the complaint to include claims for relief addressing these retaliatory measures, both under CTU's Constitution and any applicable labor protection laws. To that end, please direct your clients to preserve all documents concerning our clients—including emails, text messages, and phone logs—from October 2 onward.

A simple and speedy resolution to this dispute remains available: CTU can cease its retaliatory actions and publish properly audited financial reports to its members for the missing time periods. If those documents do not exist, we will work with you to negotiate a reasonable timeframe for completion and publication of those audits.

Please let me know if you would like to discuss this over the phone.

Respectfully,



Dean McGee



Sec. 4: The Union shall not make any distinction among its members on account of race, ethnicity, biological sex, gender, sexual orientation, age, disability, veteran status, marital status, or political, social, religious, or economic views.

Sec. 5: The members of this Union hereby declare their faith in each other and their consequent insistence upon the maintenance of the democratic processes and of the representative form of government by which the Union functions in all relations between the Union and its members.