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Chicago, Illinois 60603  
312.263.7668

Katy Coba, Chief Operating Officer  
State of Oregon  
155 Cottage Street NE  
Salem, OR 97301

Aug. 24, 2018

Dear Ms. Coba:

I am president of the Liberty Justice Center, a public-interest law firm that represented Plaintiff Mark Janus before the United States Supreme Court in *Janus v. AFSCME*. I write this letter to inform you that state and local government employers must immediately cease and desist deducting union member dues and “agency fees” from employee paychecks for remittance to unions, or any fees directed by religious objectors to a non-religious charitable organization in lieu of paying a union. Per the Supreme Court’s June 27, 2018 ruling, such dues or fees are unconstitutional and an infringement on employees’ First Amendment freedom of speech.

The Supreme Court’s decision made clear that a government employer may only deduct union dues or fees from an employee’s paycheck if the employee has “clearly and affirmatively” consented to the deduction.

Any previous authorizations for the deduction of dues or fees that employees made before the *Janus* decision were based on a choice the Supreme Court has declared unconstitutional: become a member and pay dues, or pay fees to a union as a nonmember. Any “consent” based upon that unconstitutional choice was made under duress, not freely given, and is invalid because it does not satisfy the “clear and affirmative” consent standard established by the Supreme Court in *Janus*.

Therefore, we expect that the State of Oregon will immediately cease and desist deducting any and all union payments, including membership dues and “agency fees,” from employee paychecks, unless and until an employee clearly and affirmatively consents to paying membership dues or other fees. If you do not comply with this request, we are prepared to pursue litigation both to cease collection of union dues and fees and to recover dues and fees wrongfully taken from workers.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Hughes", with a long horizontal stroke extending to the right.

Patrick Hughes  
President