

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JULIE SU, Acting Secretary of Labor,	)	
United States Department of Labor,	)	
	)	
Plaintiff,	)	No. 23 C 4983
	)	
v.	)	Judge Hunt
	)	
COMMITTEE FOR FAIR & EQUAL	)	
REPRESENTATION,	)	
	)	
Defendants.	)	

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

The Plaintiff, the Secretary of Labor, by and through her attorney, Morris Pasquale, Acting United States Attorney for the Northern District of Illinois, moves for summary judgment in the above-captioned case. Plaintiff seeks a judgment voiding the January 7, 2023, election of officers conducted by the Committee for Fair and Equal Representation (CFER) for violating 29 U.S.C. §§ 481-483, and directing Defendant to conduct a new election for the offices of President, Vice President, and Recording Secretary under Plaintiff’s supervision, and for other appropriate relief. The Secretary submits a brief in support of her motion.

Respectfully submitted,

MORRIS PASQUAL  
Acting United States Attorney

By: s/ Craig A. Oswald  
\_\_\_\_\_  
CRAIG A. OSWALD  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 886-9080  
craig.oswald@usdoj.gov