

SETTLEMENT AGREEMENT

INSURANCE

WHEREAS Lake County and Operating Engineers Local 150 (Union) are parties to a Labor Agreement (Agreement) that will be effective until November 30, 2026.

WHEREAS, during the negotiations that led to this Agreement, Lake County (County) and the Lake County Health Board (Health Board) and the Union bargained over the issue of health insurance benefits and costs.

WHEREAS, per that Agreement, the County (and County and Health Board) employees represented by Local 150 will continue to receive health insurance benefits from the Midwest Operating Engineers Local 150 Health and Welfare Fund (Fund) under the "Fund Plan", pursuant to the Health Insurance Article included in the 2022-2026 Agreement.

WHEREAS, during the negotiations that lead to the Agreement, the Union on behalf of the Fund asserted that the County owed the Fund dollars for insurance coverage for past contract years for all four employee groups represented by the Union.

WHEREAS the County and Health Board disputed the claim for past costs.

WHEREAS, the parties desire to avoid the time and costs of litigation;

NOW THEREFORE, in consideration of the mutual promises and covenants set forth below, the sufficiency of which are hereby acknowledged by the parties, the parties agree as follows:

As such, the parties agree as follows:

1. The Union and employees will receive the benefits set forth in the Health Insurance Article of the Agreement covering the maintenance employees of the Health

Department and County and the Master Agreement covering the facilities, public works, and department of transportation employees of the County.

2. The Union and the Midwest Operating Engineers Local 150 Health and Welfare Fund, agree to waive and release the County and Health Board from any and all suits, claims and damages for any and all past insurance payments allegedly due and owing from the County to the Fund or Union.
3. This is the entire Agreement between the parties, except as outlined herein.

Lake County

By: _____

Lake County Health Board

By: _____

Operating Engineers Local 150

By: _____

Midwest Operating Engineers Local 150 Health and Welfare Fund

By: _____