

LAW OFFICES OF  
GREGORY, MOORE, JEAKLE & BROOKS, P.C.

THE CADILLAC TOWER  
65 CADILLAC SQUARE - SUITE 3727  
DETROIT, MICHIGAN 48226-2893  
TELEPHONE (313) 964-5600  
FAX (313) 964-2125

GORDON A. GREGORY  
JAMES M. MOORE  
SCOTT A. BROOKS  
EMILIE D. ROTHGERY

W. GLEN JEAKLE II  
RETIRED

MARK L. HEINEN  
OF COUNSEL

RACHEL N. HELTON  
OF COUNSEL

October 14, 2011

James F. Small, Regional Director  
National Labor Relations Board – Region 21  
888 South Figueroa Street – 9<sup>th</sup> Floor  
Los Angeles, CA 90017

**RE: Transit Security Systems  
Case No. 21-CA-\_\_\_\_\_**

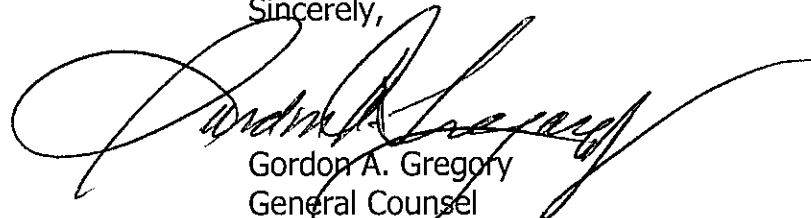
Dear Director Small:

I enclose an original Charge for filing in the above matter.

A copy of the Charge has been immediately served upon the Employer by regular mail.

Please enter my appearance as counsel for the Charging Party.

Sincerely,



Gordon A. Gregory  
General Counsel  
International Union, SPFPA

GAG/pmg

Enc.

cc: L. Richman  
D. Hickey  
D. Eagle  
M. Hough  
G. Thomas  
S. Maritas

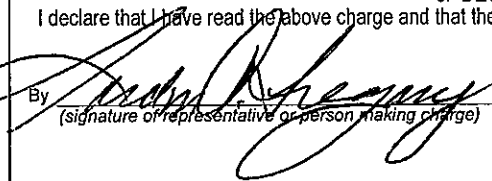
UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**

Case

Date Filed

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Transit Security Systems	b. Tel. No. 619-775-7000
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 1260 Moreno Blvd. - Suite 200 San Diego, CA 92110	e. Employer Representative Larry Richman
	g. e-Mail
	h. Number of workers employed 200
i. Type of Establishment (factory, mine, wholesaler, etc.) Security Agency	j. Identify principal product or service Security
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) _____ of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Since on or about October 1, 2011, and continuing to date, the Employer, by its officers, agents and representatives, has engaged in and is engaging in unfair labor practices as follows: 1. By unilaterally changing dates for contract negotiation meetings, and otherwise refusing and failing to meet in a timely manner for collective bargaining. 2. By insisting that permissive subjects, such as the assumption of client service contracts, be bargained. 3. By unilaterally withdrawing agreed upon contract provisions.  By the foregoing and other acts, the Employer has interfered with, restrained and coerced employees in their exercise of the rights guaranteed in Section 7 of the Act.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) International Union, Security, Police and Fire Professionals of America (SPFPA) and its Local Union No. 245	
4a. Address (Street and number, city, state, and ZIP code) 25510 Kelly Road Roseville, MI 48066	4b. Tel. No. 586-772-7250
	4c. Cell No.
	4d. Fax No. 558-772-9644
	4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Same as item 3.	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
By  (signature of representative or person making charge)	Tel. No. 313-964-5600
Gordon A. Gregory, General Counsel (Print/type name and title or office, if any)	Office, if any, Cell No.
	Fax No. 313-964-2125
	e-Mail Gordon@unionlaw.net
65 Cadillac Square, Suite 3727, Detroit, MI 48226 Address	10/14/2011 (date)

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)****PRIVACY ACT STATEMENT**Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.