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October 24, 2011

Steven J. Sorenson, Resident Officer
National Labor Relations Board – Region 21
555 W. Beech Street – Suite 418
San Diego, CA 92101-2939

**RE: Transit Systems Security
Case No. 21-CA-066878**

Dear Mr. Sorenson:

I enclose an original First Amended Charge for filing and consideration in the above matter. A copy has been immediately served on the Employer by regular mail.

Sincerely,

Gordon A. Gregory
General Counsel
International Union, SPFPA

GAG/pmg

Enc.

cc: L. Richman w/enc.
D. Hickey w/enc.
D. Eagle w/enc.
S. Maritas w/enc.
M. Hough w/enc.

INTERNET
FORM NLRB-501
(2-98)
FIRST AMENDED

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

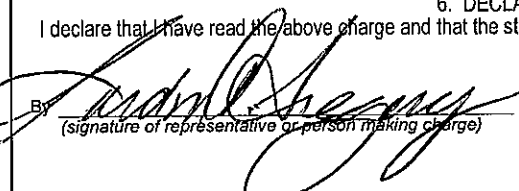
DO NOT WRITE IN THIS SPACE

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 Systems Security	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) (3) and (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) The allegations set forth in the original Charge filed October 17, 2011 are hereby incorporated by reference and made a part hereof as though fully set forth herein. Since on or about October 18, 2011, and continuing to date, the Employer's supervisors have threatened employees with discipline or discharge if they engage in handbilling, informational picketing and other protected concerted activity; and to that end, employees have been admonished that they will be photographed and otherwise recorded while engaged in such activity. Moreover, the Employer has stated that it will advise its client, MTS, to request the removal from the work site of any employee engaged in First Amendment protected concerted activity.	
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. 586-772-9644
	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 3. above	
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
Address 65 Cadillac Square, Suite 3727, Detroit, MI 48226	10/24/2011 (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.