UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

G4S SECURE SOLUTIONS (USA), INC.

and **Case 28-CA-023380**

INTERNATIONAL UNION, SECURITY, POLICE, AND FIRE PROFESSIONALS OF AMERICA (SPFPA)

ACTING GENERAL COUNSEL'S CROSS-EXCEPTIONS

Counsel for the Acting General Counsel (General Counsel), pursuant to Section 102.46 of the Board's Rules and Regulations, files the following cross-exceptions to the Decision of the Administrative Law Judge [JD(SF)- 14-12] (ALJD), issued on March 29, 2012, in the captioned case:

1. The failure of the Administrative Law Judge (ALJ) to find that G4S Secure Solutions (USA), Inc. (Respondent) maintained an overly-broad and discriminatory social networking work rule prohibiting the placement of photographs, images and videos of Respondent's employees in uniform or a Respondent place of work on social networking sites without express permission from Respondent, in violation of Section 8(a)(1) of the Act. (ALJD at 23-24) In support of this cross-exception, the General Counsel relies upon the social networking work rule at Exhibit 13, and related testimony.

2. The ALJ's failure to find that Respondent reaffirmed and enforced an overly-broad and discriminatory confidentiality rule when its Human Resources Manager instructed an employee that he could not discuss other employees' discipline in order to show that his discipline was more severe, in violation of Section 8(a)(1) of the Act. (ALJD at 30) In

support of this cross-exception, the General Counsel relies upon the testimony of Janelle Kercher (Tr. 161 - 163).

Dated at Phoenix, Arizona, this 10th day of May 2012.

Respectfully submitted,

/s/ Sandra L. Lyons

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