

**UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
REGION 14**

Hortense Moss	)	
	)	
	)	Petitioner
	)	
and	)	
	)	
Go Ahead North America, LLC	)	Case No. 14-RD-1946
	)	
	)	Employer
	)	
and	)	
	)	
Laborers Local 509	)	
	)	
	)	Union

**EXCEPTIONS TO HEARING OFFICER'S REPORT ON OBJECTIONS**

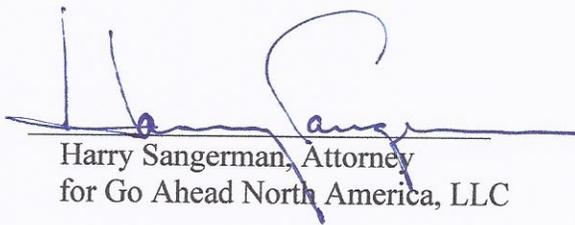
Go Ahead North America, LLC ("Go Ahead"), by its attorney Harry Sangerman of Sangerman & Gilfillan, P.C., excepts to the Hearing Officer's Report on Objections in the above matter as follows:

1. The finding that the promise to waive initiation fees does not warrant setting aside the election where the waiver excused the debt of employees who already owned initiation fees.
2. The finding that the "Employer failed to demonstrate that the Union has a practice of enforcing the payment of delinquent dues."
3. The finding that because there is no union security clause at Go Ahead the Union had no means to collect past dues.
4. The finding that the promise to waive past dues did not confer a financial benefit.
5. The finding that there was no proof any dues were owed.

6. The finding that the promise to waive delinquent dues does not warrant setting aside the election.
7. The finding that the promise not to charge dues until a contract is reached does not warrant setting aside the election.
8. The finding that the benefits flyer was not a promise of benefits that warranted setting aside the election.
9. The finding that the Union's promise to waive dues was not an objectionable material misrepresentation.
10. The finding that the Union's Constitution and internal waiver letters were provided in sufficient time for the Employer to review the documents and present its evidence or that the documents were available prior to the hearing.

In view of the above and the entire record, Go Ahead respectfully requests that the Hearing Officer's recommendations be rejected and that the election be set aside and a new election directed.

A brief in support of the Exceptions will be filed separately.



Harry Sangerman, Attorney  
for Go Ahead North America, LLC

Sangerman & Gilfillan, P.C.  
1854 N. Burling Street  
Chicago, Illinois 60614

Dated: February 16, 2011

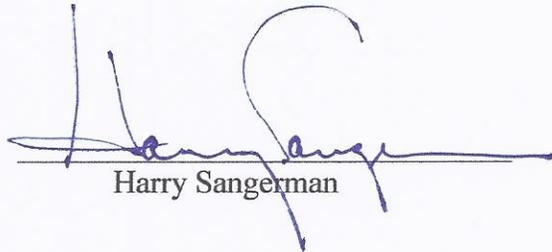
**CERTIFICATE OF SERVICE**

The foregoing Exceptions to Hearing Officers Report on Objections was filed with the Board via the Board's e-filing procedure and copies sent via U.S. Mail this 16<sup>th</sup> day of February 2011 to:

Mr. Claude Harrell  
Regional Director  
National Labor Relations Board  
1222 Spruce Street  
St. Louis, MO 63104

Laborers Local 509  
c/o Mr. Rodney Masterson  
Field Representative  
5100 Laborers' Way, Suite A  
Marion, IL 62959

Ms. Hortense Moss  
4303 Caseyville Avenue  
East St. Louis, MO 62204



Harry Sangerman