

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

PARAGON SYSTEMS, INC.

and

Case 5-CA-127523

NATIONAL ASSOCIATION OF SPECIAL POLICE
AND SECURITY OFFICERS

**COUNSEL FOR THE GENERAL COUNSEL'S CROSS-EXCEPTIONS
TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE**

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Pursuant to Section 102.46 of the Board's Rules and Regulations, Series 8, as amended, counsel for the General Counsel submits the following Cross-Exception to the Decision of the Administrative Law Judge, the Honorable Eric M. Fine, that was issued in this proceeding on September 30, 2015.

1.

Counsel for the General Counsel excepts to the Administrative Law Judge's failure to recommend to the Board that it reverse its decision in *Spruce Up Corp.*, 209 NLRB 194 (1974), and return to the plain language of the U.S Supreme Court's decision in *NLRB v. Burns Security Services*, 406 U.S. 272. See Administrative Law Judge's Decision (ALJD) at 41, ln. 40-41.

Dated at Baltimore, Maryland this 4th day of December 2015.

Respectfully submitted,

/s/ Chad M. Horton

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December 2015, I served Counsel for the General Counsel's Cross-Exceptions to the Decision of the Administrative Law Judge on the following individuals by e-mail:

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