

To: Lou Tartack
SPFPA Local 506 President & International Trustee
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Certified Mail

3/18/19

Dear Brother Tartack

In accordance with Article XX Charges and Trials of International Officers Section 1(b) of the 2015 SPFPA Constitution & By-Laws, we the undersigned hereby are filing formal charges with you and the SPFPA International Union Executive Board against SPFPA Vice President Rick Q'Quinn, based on the following:

1. Rick O'Quinn is an elected International Officer, SPFPA Executive Board Member, SPFPA Region 2 Vice President and Senior Advisor to the International President.
2. Commencing on February 9, 2010, SPFPA Region 2 Vice President Rick O'Quinn's wife, Mabel O'Quinn filed papers with the Florida Department of State Division of Corporations in Tallahassee, FL incorporating a company called Patronus Systems Inc.
3. Patronus Systems Inc. is a security company and has listed both Mabel O'Quinn and [REDACTED]
4. [REDACTED]
5. Paragon Systems, Inc officers are presently represented by the SPFPA International Union and its various amalgamated local unions for the purposes of collective bargaining.
6. [REDACTED]
7. Patronus Systems, Inc: Organized in 2010 was a subcontract provider to [REDACTED] Inc. until 2015 when it was awarded its first contract as a prime contractor. The organization has not provided services on any contract without [REDACTED] Inc.; prime or subcontractor.

8. Patronus Systems Partners, LLC: Created in July 2018 with same address and principal as Patronus Systems Inc., therefore our understanding is they are affiliate organizations under SBA guidelines. Both companies are owned by Mabel O'Quinn.
9. The business addresses used by both Patronus Systems, Inc and Patronus Systems Partners, LLC have according to documents are the same addresses SPFPA Region 2 Vice President Rick O'Quinn has used and listed in NLRB government filings.
10. Our research indicates neither Patronus Systems, Inc or Patronus Systems Partners LLC have provided services without Paragon Systems, Inc., nor have they worked with any other security provider in the industry as a subcontractor not related to [REDACTED]
[REDACTED]
11. Patronus Systems, Inc. currently has two prime contracts, one of which we know Paragon Systems, Inc. is a subcontractor. By way of size challenge, we asserted that the totality of circumstances regarding Patronus Systems, Inc (and by way of ownership Patronus Systems Partners, LLC) that the firm is affiliated to [REDACTED] Patronus Systems Partners LLC was organized on July 12, 2018 in the State of Florida.
12. Article III and Article V of the filing indicate Ms. Mabel R. O'Quinn as the registered agent and authorized representative of the organization. As we know Ms. O'Quinn is the apparent owner and President of Patronus Systems, Incorporated the provider of services for Eastern Washington/Idaho and West Virginia (portion) PSO programs, which were also small business set-aside programs.
13. The Florida registration for Patronus Systems, Inc is still listed as an active corporation with an annual report filing dated February 13, 2018; Mabel O'Quinn listed as the President (page 5). The address listed is the same address as the organization documents for Patronus Systems Partners, LLC. On November 28, 2018 Ms. Mabel R. O'Quinn filed for Dissolution of Patronus Systems Partners, LLC.
14. In accordance with the solicitation provisions, it appears that Patronus Systems Partners LLC used the relevant past performance of a "subsidiary, parent, or other affiliated company" as relevant past performance for the FPS New Jersey solicitation. The firm has no other contract awards listed on GovTribe that would constitute past performance.

15. Article VII, page 8 of this document has two personnel listed on the Board of Directors upon incorporation in 2010, Ms. O'Quinn and [REDACTED]. The Articles also outline the authorization of Patronus Systems Inc to issue up to 750,000 common shares. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16. NLRB documents in Case Number: 12-RC-009330 lists Rick O'Quinn: Vice President of International Union, Security Police and Fire Professionals of America (SPFPA) address as 3610 Harlock Road Melbourne, FL 32934-8409. This is the same home address listed for Ms. Mabel R. O'Quinn - Rick O'Quinn's wife and the registered agent President and Board member of Patronus Systems Partners, LLC and Patronus Systems, Inc.
17. This address 3610 Harlock Road Melbourne, FL 32934-8409 has been used for business registration by Patronus Systems INC. The property owner's name is O'quinn Ricky D. The building was erected in 2003.
18. It should also be noted NLRB documents in Case Number: 12-RC-097792 lists Rick O'Quinn: Vice President of International Union, Security Police and Fire Professionals of America (SPFPA) office address as 200 4100 N Wickham Rd Ste 102 Melbourne, FL 32935 which is the same addressed used as the Principle office of Patronus Systems, Inc used by both Mabel O'Quinn and [REDACTED].
19. Patronus Systems Inc was also subject of an NLRB Unfair Labor charge brought by the UNITED GOVERNMENT SECURITY OFFICERS OF AMERICA INTERNATIONAL UNION UGSOA a competitor union of SPFPA in Case 09-CA-165689 whereby the UGSOA charge alleged, in pertinent part, that Patronus Systems Inc. (the "Employer") is a "perfectly clear" successor and violated Section 8(a)(5) of the National Labor Relations Act by unilaterally reducing pay rates for unit employees. However, under current Board law, the Employer was not a "perfectly clear" successor because it made clear that it intended to change terms and conditions of employment when it offered jobs to the unit employees. The Employer fully complied with current Board law in fixing initial terms by clearly announcing to employees specific changes in existing terms before or as they were offered employment. Moreover, the Employer thereafter met its obligations as a Burns successor to recognize and bargain with the Union, and the parties have been bargaining and have resolved all of the alleged unilateral changes aside from the allegation still on appeal.

20. It should be noted the address listed for Patronus Systems Inc is 4100 N WICKHAM RD MELBOURNE, FL 32935. This is the same address as Rick O'Quinn: Vice President of International Union, Security Police and Fire Professionals of America (SPFPA) uses as his office address as noted above as well as Patronus Systems Inc Ohio Incorporation Documents.
21. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (c) "Industry affecting commerce" means any activity, business, or industry in commerce or in which a labor dispute would hinder or obstruct commerce or the free flow of commerce and includes any activity or industry "affecting commerce" within the meaning of the Labor Management Relations Act, 1947, as amended, or the Railway Labor Act, as amended.
22. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (d) "Person" includes one or more individuals, labor organizations, partnerships, associations, corporations, legal representatives, mutual companies, joint-stock companies, trusts, unincorporated organizations, trustees, trustees in cases under Title 11 of the United States Code, or receivers.
23. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (e) "Employer" means any employer or any group or association of employers engaged in an industry affecting commerce (1) which is, with respect to employees engaged in an industry affecting commerce, an employer within the meaning of any law of the United States relating to the employment of any employees or (2) which may deal with any labor organization concerning grievances, labor disputes, wages, rates of pay, hours of employment, or conditions of work, and includes any person acting directly or indirectly as an employer or as an agent of an employer in relation to an employee but does not include the United States or any corporation wholly owned by the Government of the United States or any State or political subdivision thereof.
24. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (f) "Employee" means any individual employed by an employer, and includes any individual whose work has ceased as a consequence of, or in connection with, any current labor dispute or because of any unfair labor practice or because of exclusion or expulsion from a labor organization in any manner or for any reason inconsistent with the requirements of this Act.

25. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (i) "Labor organization" means a labor organization engaged in an industry affecting commerce and includes any organization of any kind, any agency, or employee representation committee, group, association, or plan so engaged in which employees participate and which exists for the purpose, in whole or in part, of dealing with employers concerning grievances, labor disputes, wages, rates of pay, hours, or other terms or conditions of employment, and any conference, general committee, joint or system board, or joint council so engaged which is subordinate to a national or international labor organization, other than a State or local central body.
26. Labor-Management Reporting and Disclosure Act of 1959, As Amended defines (j) A labor organization shall be deemed to be engaged in an industry affecting commerce if it -
1. is the certified representative of employees under the provisions of the National Labor Relations Act, as amended, or the Railway Labor Act, as amended; or
 2. although not certified, is a national or international labor organization or a local labor organization recognized or acting as the representative of employees of an employer or employers engaged in an industry affecting commerce; or
 3. has chartered a local labor organization or subsidiary body which is representing or actively seeking to represent employees of employers within the meaning of paragraph (1) or (2); or
 4. has been chartered by a labor organization representing or actively seeking to represent employees within the meaning of paragraph (1) or (2) as the local or subordinate body through which such employees may enjoy membership or become affiliated with such labor organization; or
 5. is a conference, general committee, joint or system board, or joint council, subordinate to a national or international labor organization, which includes a labor organization engaged in an industry affecting commerce within the meaning of any of the preceding paragraphs of this subsection, other than a State or local central body.
27. Labor-Management Reporting and Disclosure Act of 1959, As Amended clearly states under Report of Officers and Employees of Labor Organizations (29 U.S.C. 432) - SEC. 202. (a) Every officer of a labor organization and every employee of a labor organization (other than an employee performing exclusively clerical or custodial services) shall file with the Secretary a signed report listing and describing for his preceding fiscal year-

(1) any stock, bond, security, or other interest, legal or equitable, which he or his spouse or minor child directly or indirectly held in, and any income or any other benefit with monetary value (including reimbursed expenses) which he or his spouse or minor child derived directly or indirectly from, an employer whose employees such labor organization represents or is actively seeking to represent, except payments and other benefits received as a bona fide employee of such employer;

(2) any transaction in which he or his spouse or minor child engaged, directly or indirectly, involving any stock, bond, security, or loan to or from, or other legal or equitable interest in the business of an employer whose employees such labor organization represents or is actively seeking to represent;

(3) any stock, bond, security, or other interest, legal or equitable, which he or his spouse or minor child directly or indirectly held in, and any income or any other benefit with monetary value (including reimbursed expenses) which he or his spouse or minor child directly or indirectly derived from, any business a substantial part of which consists of buying from, selling or leasing to, or otherwise dealing with, the business of an employer whose employees such labor organization represents or is actively seeking to represent;

(4) any stock, bond, security, or other interest, legal or equitable, which he or his spouse or minor child directly or indirectly held in, and any income or any other benefit with monetary value (including reimbursed expenses) which he or his spouse or minor child directly or indirectly derived from, a business any part of which consists of buying from, or selling or leasing directly or indirectly to, or otherwise dealing with such labor organization;

(5) any direct or indirect business transaction or arrangement between him or his spouse or minor child and any employer whose employees his organization represents or is actively seeking to represent, except work performed and payments and benefits received as a bona fide employee of such employer and except purchases and sales of goods or services in the regular course of business at prices generally available to any employee of such employer; and

(6) any payment of money or other thing of value (including reimbursed expenses) which he or his spouse or minor child received directly or indirectly from any employer or any person who acts as a labor relations consultant to an employer, except payments of the kinds referred to in section 302(c) of the Labor Management Relations Act, 1947, as amended.

(b) The provisions of paragraphs (1), (2), (3), (4), and (5) of subsection (a) shall not be construed to require any such officer or employee to report his bona fide investments in securities traded on a securities exchange registered as a national securities exchange under the Securities Exchange Act of 1934, in shares in an investment company registered under the Investment Company Act or in securities of a public utility holding company registered under the Public Utility Holding Company Act of 1935, or to report any income derived therefrom.

(c) Nothing contained in this section shall be construed to require any officer or employee of a labor organization to file a report under subsection (a) unless he or his spouse or minor child holds or has held an interest, has received income or any other benefit with monetary value or a loan, or has engaged in a transaction described therein.

28. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn's took an oath of office and;

29. WHEREAS, the SPFPA International Union exclusively represents "GUARDS" as defined under Section 9(b)3 of the Act and;

30. WHEREAS, the SPFPA International Union is a labor organization engaged in an industry affecting commerce and whereas SPFPA Region 2 Vice President Rick O'Quinn's wife operates a number of security companies, and is listed as a director of Patronus Systems

[REDACTED]

31. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn's elected position is clearly a conflict of interest based on his wife Mabel O'Quinn's ownership interest in both Patronus Systems, Inc and Patronus Systems Partners LLC and;

32. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn had full knowledge of his wife Mabel O'Quinn's ownership interest and;

33. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn had full knowledge that his wife Mabel O'Quinn's was partners with [REDACTED]

[REDACTED]

34. [REDACTED]

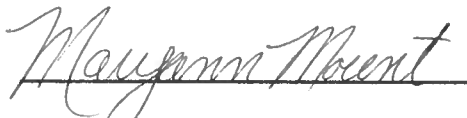
35. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn has negotiated a number of collective bargaining agreements on behalf its members who currently work [REDACTED]

36. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn has FAILED to disclose his wife Mable O'Quinn's ownership interest in both Patronus Systems, Inc and Patronus Systems Partners LLC as required under the Labor-Management Reporting and Disclosure Act of 1959, As Amended and;

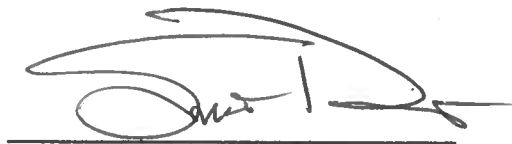
37. WHEREAS, SPFPA Region 2 Vice President Rick O'Quinn has FAILED to disclose his wife Mable O'Quinn's partnership with [REDACTED] as required under the Labor-Management Reporting and Disclosure Act of 1959, As Amended and;

WHEREFORE, the above warrants a criminal investigation, SPFPA Region 2 Vice President Rick O'Quinn should be reported to the Department of Labor by the SPFPA International Executive Board and be expelled from SPFPA membership and removed from office with such other sanctions as found appropriate by the International Executive Board. All documents can be found at the following website address. <https://spfpacorruption.blogspot.com/>

DATED: March 18, 2019



Affidavit of Maryann Mount SPFPA Local 506 Member



Affidavit of Scott Denny SPFPA Local 506 Member