

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 24**

ST. LUKE'S MEMORIAL HOSPITAL, INC ,
D/B/A HOSPITAL SAN LUCAS

Employer

and

UNIDAD LABORAL DE ENFERMERAS (OS) Y
EMPLEADOS DE LA SALUD

Petitioner

Case 24-RC-099415

SUPPLEMENTAL DECISION ON OBJECTIONS

Pursuant to a Decision and Direction of Election of April 11, 2013, an election by secret ballot was conducted on May 9, 2013, among certain employees¹ of the Employer, to determine whether they desired to be represented for the purpose of collective bargaining by Unidad Laboral de Enfermeras (os) y Empleados de la Salud (herein the Petitioner).

The tally of ballots, made available to the parties, revealed the following:

Approximate number of eligible voters	227
Void Ballots	1
Votes cast for Petitioner	31
Votes cast against Petitioner	178
Valid votes counted	209
Challenged ballots	2
Valid votes counted plus challenged ballots	211

Challenges are not sufficient in number to affect the results of the election. A majority of the ballots were not cast for the Petitioner.

¹ The Unit is the following: **Included:** All full time and regular part time licensed practical nurses, X-ray technicians, operating room technicians, medical emergency technicians, physical therapy technicians, respiratory technicians, and medical escorts employed by the Employer at its hospital located at Tito Castro Avenue 917, Ponce, PR;

Excluding: All other employees, office clerical employees, confidential employees, guards, supervisors, professional employees as defined in the Act, and those employees located in the cardiovascular department who are represented by the Union in a separate bargaining unit.

On May 14 and 16, 2013,² timely objections to the conduct affecting the results of the election were filed by the Petitioner, and served upon the Employer.

Pursuant to the Decision and Direction of Election, and in conformity with Section 102.69 of the Board's Rules and Regulations, the undersigned Regional Director caused an investigation to be made of the objections to the election and to conduct affecting the results of the election and now sets forth her findings, and conclusions with respect thereto.

The Petitioner's objections filed on May 14, 2013, which are attached hereto as "Exhibit I," consist of 13 numbered paragraphs, and the supplemental objections filed on May 16, 2013, which are attached hereto as "Exhibit II," consist of 5 unnumbered paragraphs, which are identified and numbered here as Objections 14, 15, 16, 17, and 18.

OBJECTIONS 1 and 3

These objections consist of two parts. The first part alleges that the Employer engaged in surveillance of employee and Union officials' union activities while they were distributing leaflets at the entrance to the employee parking lot. The Petitioner did not submit any evidence, however, to show that the Employer engaged in any specific objectionable conduct other than merely watching its employees participate in the on-going activities to promote the Union.

The fundamental principles governing employer surveillance of protected employee activity are set forth in F. W. Woolworth Co., 310 NLRB 1197 (1993). The Board in Woolworth reaffirmed the principle that an employer's mere observation of open and public union activity on or near its property, unlike photographing and videotaping, does not constitute unlawful surveillance. Furthermore, it is well settled that management officials do not create an unlawful impression of surveillance by appearing to monitor union activity that is conducted openly, particularly when it occurs on company premises, unless the official's act in a manner that is out of the ordinary. See, e.g. Rogers Electric, Inc., 346 NLRB 508, 509 (2006). In the instant case,

² Petitioner filed its initial objections on May 14 and supplemented these objections by letter dated May 16, 2013.

the Petitioner did not submit any evidence or make any offer of proof to support a finding that the Employer was photographing or videotaping employee Union activity, or that management officials' actions exceeded a casual observation of handbilling activities. Accordingly, this part of the objection is overruled.

With regard to the second part of these objections, Petitioner claims that during the critical period the Employer engaged in objectionable conduct by assuming threatening postures intended to intimidate those employees who picked-up leaflets being distributed. In that regard, the Petitioner offered the testimony of a Union representative and of a named employee. In its offer of proof, the Petitioner relied on an incident that took place about May 7, 2013, at 6:50 a.m., between the named Union representative and an Employer representative. According to the Petitioner, as the Employer's representative was entering the gate in the parking lot, he told the Union representative "you got involved with my son, don't you get involved with my son, get involved with me, that's low and that's no way to do campaigns, that's dirty" No evidence was presented, however, to establish that there was some nexus between this isolated statement and the ongoing Union activity. This statement, even if true, does not establish that the Employer "assumed threatening postures to intimidate employees who picked-up leaflets at the front entrance". Rather, it appears to be a personal incident, isolated in nature, and unrelated to the on-going Union campaign. Accordingly, this part of the objection is also overruled.

OBJECTION 2

The Petitioner's Objection No. 2 essentially alleges that on various occasions the Employer prohibited the distribution of leaflets at the Employer's front gate, and also drove cars and motorcycles at a high speed through the gate in order to intimidate the individuals that were distributing the leaflets. The evidence shows that the Union distributed leaflets at the front gate for the last two weeks before the election. However, there is no evidence that the Employer forced Union representatives to move away from the front gate or to stop the distribution of the

leaflets. In its statement of position, the Union asserts that Employer's officials entered the parking lot at the facility in their vehicles at a high speed and in a frightening manner, but the Union failed to offer any direct evidence regarding such allegation. The Union also alleged that the Employer on several occasions prohibited the distribution of union propaganda near the gate of the parking lot. However, the Union also failed to provide evidence to show that the Employer forced the Union to move from the gates and stop distributing leaflets. In this regard, the Union made an offer of proof in which a Union official would allegedly testify that a guard informed him that he could not distribute Union propaganda from where he was standing. But, admittedly, while the Union official was talking to this guard, a second guard approached them and pointed out that he was mistaken and that the Union could distribute propaganda there. Finally, the Union alleges that Employer officials "remained hidden" in vehicles inside the employee parking lot. However, it appears that what the Union is essentially trying to allege is that the Employer engaged in the surveillance of employees who received leaflets from the Union. As previously discussed, it is well-settled that "management officials may observe public union activity without violating the Act so long as those officials do not 'do something out of the ordinary.'" Eddyleon Chocolate Co., 301 NLRB 887, 888 (1991), See also Wal-Mart Stores, Inc., 350 NLRB 879 (2007), Town & Country Supermarkets, 340 NLRB 1410 (2004). In this regard, the Union has again failed to provide evidence that management officials engaged in anything more than the mere observation of public union activity. Accordingly, the objection is overruled.

OBJECTION 4

Objection No. 4 alleges that the Employer coerced its employees by informing them that if the Union won the election the employees would lose their medical plan. In this regard, the Petitioner failed to offer any evidence in support of this objection. Accordingly, the same is overruled.

OBJECTIONS 5 and 9

Because these objections are basically grounded on the same principle, they are discussed together herein. Objection No. 5 alleges that the Employer engaged in a campaign of intimidation and "terror" by showing them videos and other related propaganda and also used former union stewards to obtain confidential information about the Union. Objection No. 9 alleges that the Employer "used information regarding violence, and the burning of a hotel linking Unions with those acts of violence."

The Union, however, failed to adduce any evidence or offer to provide any evidence about the content of the alleged videos. Accordingly, the same is overruled.

OBJECTION 6

The Petitioner alleges that the Employer violated the Employee's Manual section 5.02 and 5.03 item #39 and "the legal disposition in which the rules are based." In that regard, the Petitioner submitted copies of the aforementioned sections of the employee manual which are general dispositions about disciplinary actions to employees. Aside from submitting copies of the manual, the Petitioner failed to clearly state its rationale for this objection. Accordingly, the same is overruled.

OBJECTION 7

The Petitioner generally alleges that the Employer disciplined three employees during the election campaign. With regard to this allegation the Petitioner failed to clearly state the basis of the objection nor provided any evidence in support of the same. Accordingly, this objection is overruled.

OBJECTION 8

Petitioner alleges that the Employer threatened its employees with eliminating 12 hour shifts to all registered and practical nurses of the emergency room and other departments.

The Petitioner, however, failed to offer any witness or documentary evidence in support of this objection. Accordingly, the same is overruled.

OBJECTIONS 10 and 15

The Petitioner alleges that the Employer disparaged the Union by using caricatures to depict its leaders in customs suggestive of political or racial ideologies. With regard to this allegation the Petitioner submitted a copy of a document labeled as Document #2, which shows a photograph that is so dark that the image in it is indistinguishable, and a chart with the salaries of union representatives from 2000 to 2012.

In the case of Midland National Insurance Co., 263 NLRB 127, 130 (1982), the Board held that it would no longer probe into the truth or falsity of pre-election campaign propaganda and would not set aside elections on the basis of misleading campaign statements.

The Board has stated that it will only intervene in cases where a party has used forged documents which render the voters unable to recognize propaganda for what it purports to be.

I find that Document No. 2 does not contain or exceed the bounds of permissible campaign propaganda. Accordingly, these objections are overruled.

OBJECTION 11

The Petitioner alleges that the Employer forced its employees to attend captive audience meetings on company time before and after regular work hours, as well as during regular work hours. The Board, in Peerless Plywood, 107 NLRB 427, 429 (1953), established an election rule in which employers and unions alike are prohibited from making election speeches on company time to massed assemblies of employees within 24 hours before the scheduled time for conducting an election. The Petitioner failed to present any evidence to support a finding that employees were required to attend captive audience meetings during the 24 hours prior to the conduct of the election. Accordingly, the Objection is overruled.

OBJECTION 12

The Petitioner alleges that the Employer, contrary to its vacation policy, granted vacations to certain employees that knowingly favored the Union. Board law has established

that the objecting party must show that the conduct in question had a reasonable tendency to interfere with the employees' free and un-coerced choice in the election. Quest International, 338 NLRB 856, 857 (2003). The Petitioner failed to present any evidence to establish that, if true, the alleged conduct affected the results of the election. Accordingly, the Objection is overruled.

OBJECTION 13 and 18

The Petitioner alleges that the Employer used confidential information to make the Union's leadership lose prestige before its members. In support of this objection, the Petitioner submitted a leaflet (labeled as 1b), where the Employer quotes language from a Puerto Rico court opinion stating that the testimony of a Union representative in that case was found not to be credible and imposing liability on the Petitioner for discharging an employe without just cause. In addition, in said leaflet the Employer questions the validity of the reasons given by the Petitioner for the absence of its legal representative from a hearing scheduled before the Board on February 25, 2013. As stated above, the Board has held in Midland National Insurance Co., 263 NLRB 127 (1982), that it will not probe into the truth or falsity of pre-election campaign propaganda. Accordingly, these Objections are overruled.

OBJECTION 14

The Petitioner alleges that the Employer offered and bestowed on employees salary raises and benefits in order to affect the results of the elections. In support of this objection, the Petitioner submitted a letter from the Employer to all employees dated February 27, 2013, granting all 'non union employees" a wage increase effective on each employee's respective anniversary date. As a general rule, the period during which the Board will consider conduct as objectionable (the critical period) is the period between the filing of the petition and the date of the election. Ideal Electric & Mfg. Co., 134 NLRB 1275 (1961). In this case the critical period was between March 1, 2013, and May 9, 2013. In Kokomo Tube Co., 280 NLRB 357, 358

(1986)³, the Board found that a wage increase that was announced and became effective before the critical pre-election but that was received 4 days after the filing of the election petition was not objectionable conduct and could not serve as the basis for setting aside the election under Ideal Electric, supra. Similarly in this case, the wage increase was announced and became effective before the critical period, and the fact that the employees may have received the increase during the critical period does not detract from the fact that the change was announced and became effective prior to the critical period. Thus, the Objection is overruled.

OBJECTION 16

The Petitioner alleges that the Employer halted and/or delayed the bargaining process at the Cardiovascular Tower, a separate bargaining unit, in order to impact the result of the election. As previously stated, Board law has established that the objecting party must show that the conduct in question had a reasonable tendency to interfere with the employees' free and un-coerced choice in the election. Quest International, 338 NLRB 856, 857 (2003). The Petitioner failed to present any evidence to establish that, if true, the conduct alleged affected the results of the election. Accordingly, the same is overruled.

OBJECTION 17

The Petitioner alleges that the Employer intended to fulfill a commitment allegedly made by the Employer's Board of Directors to destroy the Union. In that regard, the Petitioner failed to specifically define the conduct alleged to be objectionable and also failed to make an offer of proof of relevant testimony in support of its objection. As the Board has held, "the burden of proof on parties seeking to have a Board-supervised election set aside is a heavy one. The objecting party must show, inter alia, that the conduct in question affected employees in the voting unit and had a reasonable tendency to affect the outcome of the election." Delta Brands, Inc., 344 NLRB 252, 253 (2005) (internal quotations omitted). If the evidence is insufficient,

³Overruled in other respect in Spring Industries, 332 NLRB 40 (2000).

then the objecting party has failed to meet its burden. Consumers Energy Co., 337 NLRB 752 (2002). The burden of proof is particularly heavy where the margin of victory is significant. Avis-Rent-A-Car System, 280 NLRB 580, 581, 582 (1986). Thus, the Board "requires more than mere speculative harm to overturn an election." J.C. Brock Corp., 318 NLRB 403, 404 (1995) (citation omitted). Accordingly, the objection is overruled.

Having concluded that, Petitioner's Objections Number 1 through 18 are overruled in their entirety, I shall issue the appropriate Certification of Results of Election forthwith.

RIGHT TO REQUEST REVIEW

Right to File Request for Review: Pursuant to the provisions of Sections 102.69 and 102.67 of the National Labor Relations Board's Rules and Regulations, Series 8, as amended, you may obtain review of this Supplemental Decision by filing a request with the Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, DC 20570-0001. This request for review must contain a complete statement setting forth the facts and reasons on which it is based. Under the provisions of Section 102.69(g) of the Board's Rules, documentary evidence, including affidavits, which a party has timely submitted to the Regional Director in support of its objections or challenges and that are not included in the Supplemental Decision, is not part of the record before the Board unless appended to the exceptions or opposition thereto that the party files with the Board. Failure to append to the submission to the Board copies of evidence timely submitted to the Regional Director and not included in the Supplemental Decision shall preclude a party from relying on that evidence in any subsequent related unfair labor practice proceeding.

Procedures for Filing a Request for Review: Pursuant to the Board's Rules and Regulations, Sections 102.111 - 102.114, concerning the Service and Filing of Papers, the request for review must be received by the Executive Secretary of the Board in Washington, DC by close of business on **July 3, 2013**, at 5:00 p.m. (ET), unless filed electronically. Consistent with the Agency's E-Government initiative, parties are encouraged to file a request

for review electronically. If the request for review is filed electronically, it will be considered timely if the transmission of the entire document through the Agency's website is accomplished by no later than 11:59 p.m. Eastern Time on the due date. Please be advised that Section 102.114 of the Board's Rules and Regulations precludes acceptance of a request for review by facsimile transmission. Upon good cause shown, the Board may grant special permission for a longer period within which to file.⁴ A copy of the request for review must be served on each of the other parties to the proceeding, as well as on the undersigned, in accordance with the requirements of the Board's Rules and Regulations.

Filing a request for review electronically may be accomplished by using the E-filing system on the Agency's website at www.nlr.gov. Once the website is accessed, click on File Case Documents, enter NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt of the request for review rests exclusively with the sender. A failure to timely file the request for review will not be excused on the basis that the transmission could not be accomplished because the Agency's website was offline or unavailable for some other reason, absent a determination of technical failure of the site, with notice of such posted on the website.

Dated at San Juan, Puerto Rico this 19th of June 2013.



Marta M. Figueroa
Regional Director, Region 24
National Labor Relations Board
La Torre de Plaza, Suite 1002
525 F.D. Roosevelt Avenue
San Juan, Puerto Rico 00918-1002



⁴ A request for extension of time, which may also be filed electronically, should be submitted to the Executive Secretary in Washington, and a copy of such request for extension of time should be submitted to the Regional Director and to each of the other parties to this proceeding. A request for an extension of time must include a statement that a copy has been served on the Regional Director and on each of the other parties to this proceeding in the same manner or a faster manner as that utilized in filing the request with the Board.

May 14, 2013

Mrs. Marta Figueroa, Regional Director

National Labor Relations Board

Torre Plaza Las Americas 10th Floor

Suite 1002

Dear Mrs. Figueroa:

Enclosed we are sending the objections of the elections between Unidad Laboral de Enfermeras(os) y Empleados de la Salud in charge number 24-RC-099415 Enfermeras(os) Practicas(os).

1. That the Employer, its agents y representatives spied the distribution of bulletins realized by Union officers at the gate of the employee parking lot. And assumed threatening attitudes and vigilant to intimidate the employees that were picking loose leaflets
2. The Employer disavowed in various occasions the distribution of loose leaflets in front of the gate through its representatives and in occasions entered automobiles and motorcycles at high speed and in a scary way during the distribution of this promotion entering the employee parking lot hiding in vehicles without entering the hospital, staying hidden in the parking lot.
3. Spied the union leaders and the employees while the bulletins were distributed.
4. The Employer coerced the employees by notifying that if the Union wins, they will lose the health plan.
5. The Employer established a terror and fear campaign making use of visual propaganda and utilizing the union ex-delegates that received wage increase and promotions and which forced to resign to the Negotiating Union Committee and whom had confidential information of the Union and never turned in. The delegates were: Carmen Salas, Lourdes Rabassa y Joanne Maldonado.
6. Violation of Employee Manual Section 5.02 and 5.03 Item #49 and the legal dispositions where regulation is based.

7. The Employer disciplined during the campaign, three (3) employees in spite that during the hearing at NLRB the Employer argued and established the existing influences between the two groups: The San Lucas Episcopal Hospital in Ponce and the Cardiovascular Tower because both groups interacted between them and contaminated the electoral process. These allegations were made at NLRB (see transcripts).
8. Threatened with taking off the 12 hour shifts to the registered nurses and practical nurses of the Emergency Ward and other departments.
9. The use of information about violence and burning of hotels relating the unions to those violent acts.
10. The exaggerated used of cartoonist images of the union leaders with clothing alluding political ideologies and racist.
11. Forcing employees to participate in captive meetings with paid before and after working hours.
12. The Employer sent on vacation employees that favored the union contrary to the hospital policies.
13. The Employer utilized confidential Union information to discredit the leadership and its members and denied the time for the Union to meet and discuss with same those differences contrary to the Bargaining Agreement and the labor laws.

Cordially,

Radames Quinones Aponte

Executive Director, ULEES



Radames Quiñones Albert, SMA
Director Ejecutivo

Ann C. Meléndez Rodríguez RN
Presidenta

José Alverio Díaz RN
Vice Presidenta

Julió Pizarro Valdés RN
Tesorero

Maria J. Serrano
Secretaria

14 de mayo de 2013

Sra Marta Figueroa, Directora Regional
Junta Nacional de Relaciones del Trabajo
Torre Plaza Las América Piso 10
Oficina 1002
Hato Rey, Puerto Rico

Estimada señora Figueroa:

Adjunto le enviamos la objeciones de las elecciones entre la Unidad Laboral de Enfermeras(os) y Empleados de la Salud en el caso 24-RC-099415 Enfermeras(os) Prácticas(os) y Técnicos:

1. Que el Patrono, sus agentes y representantes expiaron la distribución de boletines realizados por Oficiales de la Unión en el portón del estacionamiento de los empleados.

Y asumieron composturas amenazantes y vigilantes para intimidar a los empleados que cogían las hojas sueltas.

2. El Patrono desautorizó en varias ocasiones la distribución de hojas sueltas frente al portón a través de sus representantes y en ocasiones entraron en autos y motocicletas a alta velocidad y en forma atemorizante durante la distribución de esta promoción entrando al estacionamiento de los empleados ocultos en vehículos sin entrar al hospital, manteniéndose ocultos en el estacionamiento.
3. Espió a los líderes de la unión y a los empleados mientras se distribuía los boletines.
4. El Patrono coaccionó a los empleados al notificarles que si la Unión ganaba perderían el Plan Médico.
5. El Patrono estableció una campaña de terror y miedo haciendo uso de propaganda visual y filmica y utilizando a los exdelegados de la unión que recibieron aumentos salariales y ascensos y que los obligaron a renunciar al Comité Negociador de la Unión y quienes tenían información confidencial de la

SAH JUAN, FR 00918-1720

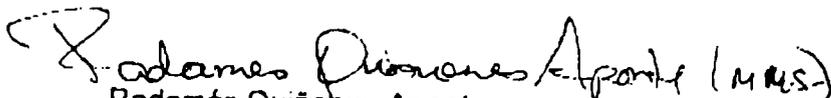
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Unión y que nunca entregaron. Los delegados fueron: Carmen Salas, Lourdes Rabassa y Joanne Maldonado.

6. Violación al Manual del Empleado Sección 5.02 y 5.03 Item #39 y las disposiciones legales donde se basa el reglamento.
7. El Patrono disciplinó durante la campaña a tres (3) empleadas a pesar de que en las vistas celebradas en la JNRT el Patrono argumentó y estableció la influencia existentes entre los dos grupos: El Hospital Episcopal San Lucas Ponce y la Torre Cardiovascular por que ambos grupos interactuaban entre sí y contaminaba el proceso electoral. Estas alegaciones las hizo en la JNRT (ver record y minutas)
8. Amenazó con quitarles los turnos de 12 horas a las enfermeras profesionales y prácticas de la Sala de Emergencia y otros departamentos.
9. El uso de información sobre violencia y quema de hoteles relacionando a las uniones con esos actos de violencia.
10. El uso exagerado de imágenes caricaturescas de los líderes de la unión con vestimenta alusivas a ideologías políticas y raciales.
11. Obligar a los empleados a participar en reuniones cautivas con paga salarial antes y después de sus horas laborables.
12. El Patrono envió de vacaciones a empleados que favorecían la Unión contrario a la política del Hospital.
13. El Patrono utilizó información confidencial de la Unión para desprestigiar al liderato y sus miembros y le negó el tiempo a la Unión para reunirse y discutir con los mismos esas diferencias contrario al Convenio Colectivo y las leyes laborables.

Cordialmente,


Radamés Quiñones Aponte
Director Ejecutivo ULEES

Via Fax 878-7665478

May 16, 2013

Mrs. Marta Figueroa, Regional Director

National Labor Relations Board

Torre Plaza Las Americas 10th Floor

Suite 1002

Dear Mrs. Figueroa:

Through this means I am submitting the additional objections to the ones already sent on May 14, 2013, to the elections between Unidad Laboral de Enfermeras(os) y Empleados de la Salud in charge number 24-RC-099415 for practical nurses and technicians of the Saint Luke's Hospital in Ponce.

- Offering and award of wage increase and benefits as a measure to affect the elections result conforming to the past practice in other hospitals and in this same hospital.
- Realization of discriminatory and defamatory information about the union and its leadership.
- Freezing of the negotiation process in Cardiovascular dilating the process of negotiation to affect the electoral process in Saint Luke's II.
- Tries to comply with a commitment made to the Board of Director's president of the Hospital of destroying the Labor Union at Saint Luke's Hospital by certain management officials.
- Defamation of the union leadership through the defamation of ULEES employees.

Cordially,

Radames Quinones Aponte

Executive Director, ULEES

ULEES

Radamés Quiñones Aponte, RNA
Director Ejecutivo

Ana C. Meléndez Feliciano, RN
Presidenta

José Alverio Díaz, RN
Vice Presidente

Julio Pizarro Valdés, RN
Tesorero

Maria J. Serrano
Secretaria

La unión  empleados de la salud

VIA FAX 787-7665478

16 de mayo de 2013

Sra. Marta Figueroa, Directora Regional
Junta Nacional de relaciones del Trabajo
Torre Plaza Las Américas Piso 10
Oficina 1002
Hato Rey, P.R.

Estimada Sra. Figueroa:

Por este medio le someto objeciones adicionales a las ya sometidas el 14 de mayo, a las elecciones entre la Unidad Laboral de Enfermeras(os) y Empleados de la Salud en el caso 24-RC-099415 para enfermeras prácticas y técnicos del Hospital San Lucas en Ponce.

- Ofrecimiento y otorgación de aumentos salariales y beneficios como medida para afectar el resultado de la elección conforme a su práctica pasada en otros hospitales y en este mismo hospital.
- Realización de información discriminatoria y difamatoria sobre la unión y su liderato.
- Congelación del proceso de negociación en Cardiovascular dilatando el proceso de negociación para afectar el proceso electoral en San Lucas II.
- Intenta cumplir un compromiso hecho al presidente de la Junta de Directores del Hospital de destruir la Unidad Laboral en el Hospital San Lucas por parte de ciertos gerenciales.
- Difamación del liderato de la unión acudiendo a la difamación de los empleados de la ULEES.

Cordialmente,


Radamés Quiñones Aponte
Director Ejecutivo ULEES

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