

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 22**

**GTS AMBULANCE TRANSPORTATION, LLC AND
ROL AMBULANCE, LLC, as single employers and/or
alter egos**

and

Case 22-CA-135312

MED-LIFE M&M

**MOTION TO TRANSFER CASE TO THE BOARD AND FOR DEFAULT
JUDGEMENT**

Pursuant to Sections 102.24 and 102.50 of the Board's Rules and Regulations and Statements of Standard Procedure, Series 8, as amended, herein called the Rules, Dorothy Foley, Counsel for the General Counsel, respectfully moves that the National Labor Relations Board, herein called the Board: (1) transfer this case and continue the proceedings before the Board; (2) deem the allegations in the Complaint, which issued on June 29, 2015, to be admitted as true without taking evidence supporting the allegations in the Complaint; and (3) grant default judgment and issue a Decision and Order on the basis of the following:

1. On August 25, 2014, Med-Life M&M Consultants, which has since been renamed Med-Life M&M, herein called the Union, filed the original charge in Case 22-CA-135312 against GTS Ambulance Transportation, LLC, herein called Respondent GTS, alleging violations of Section 8(a)(1) and (3) of the Act. The charge was served on Respondent GTS by mail on August 25, 2014. Copies of the original charge in Case 22-CA-135312, the Regional Director's letter transmitting the charge to Respondent GTS, and an affidavit of service are attached as Exhibits 1, 2, and 3, respectively.

2. On October 9, 2014, the Union filed a first amended charge which named both Respondent GTS and ROL Ambulance, LLC, herein called Respondent ROL, and collectively (Respondents GTS and ROL) herein called Respondents, alleging that Respondents, acting as single employers and/or alter egos, violated allegations of Section 8(a)(1), (3) and (5) of the Act. The first amended charge was served on Respondent GTS by mail on October 15, 2014.¹ Copies of the first amended charge in Case 22-CA-135312, the Regional Director’s letter transmitting the charge to Respondent GTS, and an affidavit of service are attached as Exhibits 4, 5, and 6, respectively.

3. Between November 12, 2014 and May 21, 2015, the Union filed amended charges two through six against the Respondents in Case 22-CA-135312. The sixth amended charge alleges that Respondents violated Section 8(a)(1), (3) and (5) of the Act. The specified amended charge, the date it was filed, and the date it was served are listed below, along with the Exhibit number (attached hereto) of the charge, the Regional Director’s letter transmitting the charge to Respondents, and the affidavit of service are as follows:

<u>CHARGE</u>	<u>DATE FILED</u>	<u>DATE SERVED</u>	<u>EXHIBITS</u>
(a) Second Amended	11/12/2014	11/12/2014	7, 8, 9
(b) Third Amended	12/29/2014	12/29/2014	10, 11, 12
(c) Fourth Amended	1/21/2015	1/21/2015	13, 14 ²
(d) Fifth Amended	3/11/2015	3/12/2015	15, 16, 17
(e) Sixth Amended	5/21, 2015	5/22/2015	18, 19, 20

4. On June 29, 2015, the Regional Director issued, by certified mail, return

¹ As an oversight, the first amended charge was not sent to Respondent ROL.

² As an oversight, the fourth amended charge was not served on Respondents with the standard transmittal letter.

receipt requested, a Complaint and Notice of Hearing, herein called the Complaint, alleging that Respondents violated Section 8(a)(1), (3) and (5) of the Act in Case 22-CA-135312. A copy of the Complaint is attached as Exhibit 21, and an affidavit of service is attached as Exhibit 22. The United States Postal Service confirmed through its website that it delivered the Complaint to Respondent GTS at its Linden, NJ facility on July 1, 2015 at 11:55 a.m. A copy of the United States Postal Service website delivery confirmation is attached as Exhibit 23. The United States Postal Service indicates through its website that delivery of the Complaint was attempted to be made to Respondent ROL on June 30, 2015 and July 1, 2015, but no authorized recipient was available. A copy of the United States Postal Service website attempted delivery confirmation is attached as Exhibit 24.³

5. The Complaint states, in pertinent part, that Respondents shall file an answer to the Complaint within fourteen days from the service thereof and that, absent such action, all of the allegations in the Complaint shall be deemed to be true and shall be so found by the Board upon a Motion for Default Judgment. Respondents Answers were due on July 13, 2015.

6. By a letter dated July 14, 2015, Respondents were advised by the Regional Attorney of Region 22, Richard Fox, that Respondents had failed to file an answer to the Complaint, and that absent the filing of an answer to the Complaint by July 21, 2015, a

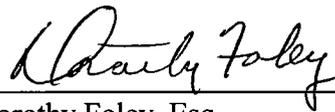
³ Under Section 102.113(a) of the Board's Rules, complaints may be served by certified mail and a failure to accept the certified mailing cannot defeat such valid service. *J.E.W. Design & Construction, Inc.*, 357 NLRB No. 86 fn.1 (Sept. 9, 2011) citing *I.C.E. Electric, Inc.*, 339 NLRB 247 fn. 2 (2003). Accordingly, proof of delivery to Respondent ROL is not required in order to establish that Respondent ROL was properly served with a copy of the Complaint. Further, the Board has held that service on one member of an alter-ego or single employer is service upon all members of the alter-ego or single employer. See *Carib Inn Tennis Club*, 322 NLRB 214, 216 (1996); *Il progresso Italo Americano Publishing*, 299 NLRB 270, 273 fn. 4 (1990). Respondent GTS was served with the Complaint and delivery was confirmed on July 1, 2015. Neither Respondent GTS nor Respondent ROL have filed an Answer to the Complaint denying that the two companies are alter-egos and single employers. Accordingly, Respondent ROL was served with the Complaint by virtue of service on Respondent GTS.

Motion for Default Judgment would be filed. A copy of the July 14, 2015 letter to Respondents is attached as Exhibit 25. The letter was sent to Respondent GTS at its address in Linden, New Jersey and to Respondent ROL at its address in Morris Plains, New Jersey. The letter was sent by both United Parcel Service overnight delivery and certified mail to both locations.

7. Respondents have not filed Answers to the Complaint within the time period required by Section 102.20 of the Board's Rules, or within the period permitted by an extension granted by Region 22's Regional Attorney. Respondents have given no satisfactory reason for their failure to have done so. As of today, July 27, 2015, Respondents still have not filed Answers to the Complaint, even though it is undisputed that Respondents had knowledge of the Complaint and its obligation to file an Answer, since at the latest July 1, 2015. Respondents have provided no satisfactory reason for their failure to have filed an Answer.

WHEREFORE, Counsel for the General Counsel respectfully requests, as provided in Sections 102.24 and 102.50 of the Board's Rules, that the Board deem all matters alleged in the Complaint to be admitted as true, and that they be so found, and that a Decision and Order issue containing findings of fact, conclusions of law, and an appropriate remedy for the violations alleged in the Complaint.

Dated: July 30, 2015



Dorothy Foley, Esq.
Counsel for the General Counsel
National Labor Relations Board
Region 22
20 Washington Place, 5th Floor
Newark, New Jersey 07102

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 22-CA-135312	Date Filed 8/25/2014

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1 EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS Ambulance Transportation, LLC		b. Tel. No. (908) 718-5196
d. Address (Street, city, state and ZIP code) 1717 Pennsylvania Avenue Linden, NJ 07036		c. Cell No.
e. Employer Representative Roy Santos, President		f. Fax No. (908) 275-3548
		g. e-Mail
		h. Number of workers employed

i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation	j. Identify principal product or service Medical Transportation
---	---

k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (1)(f) subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)
See Attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Med-Life M&M Consultancy

4c. Address (Street and number, city, state, and ZIP code) 15 Goldsmith Avenue, Suite 21 Newark, NJ 07112	4a. Tel. No. (732) 900-3169
	4b. Cell No.
	4d. Fax No.
	4e. e-Mail

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6 DECLARATION		Tel. No. (732) 900-3169
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief		Office, if any, Cell No.
Eric McLemore, President		Fax No.
By <u>[Signature]</u> (Signature of representative or person making charge)		e-Mail medlifeunion@gmail.com
Address <u>see 4c above</u>		
Date <u>8/27/14</u> (date)		

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to provide the information will cause the NLRB to decline to conduct its processing.

**GTS AMBULANCE TRANSPORTATION, LLC
CHARGE ATTACHEMENT**

1. Since about July, 2014, the above-referenced Employer, by its officers, agents and representatives, has violated Section 8(a)(1) of the National Labor Relations Act by:

- (a) Interrogating employees regarding their union support and activities.
- (b) Soliciting grievances and promising to remedy them if employees do not support a union.
- (c) Promising additional benefits if employees do not support a union.
- (d) Threatening employees with job loss and reduced compensation if they support a union.
- (e) Threatening to close the facility if employees elect a union as their bargaining representative.
- (f) Making statements that selecting a union representative would be futile.

2. The above-referenced Employer, by its agents, officers and representatives, has violated Section 8(a)(3) of the Act by discriminating against against employees, as follows, because they supported a union and/or engaged in union activity:

- (a) On about July 20, 2014, discharged Jenita Dunn.
- (b) On about July 25, 2014, discharged Jamal Woltz.
- (c) On about August 13, 2014, demoted and reduced the pay of Cecilia Valente.
- (d) On about August 15, 2014, issued a final warning to Doug Gelsliechter.
- (e) On about August 22, 2014, issued warnings and suspended Farah Gonzalez.

2014 AUG 25 AM 10: 35

RECEIVED
NLRB-REGION 22
NEWARK, NJ

2014 AUG 25 AM 10: 35

EXHIBIT 1



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



Download
NLRB
Mobile App

August 25, 2014

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

Re: GTS AMBULANCE TRANSPORTATION,
LLC
Case 22-CA-135312

Dear Mr. SANTOS:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If this Board agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing Form NLRB-4701, Notice of Appearance. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly. **Due to the nature of the allegations in the enclosed unfair labor practice charge, we have identified this case as one in which injunctive relief pursuant to Section 10(j) of the Act may be appropriate.**

EXHIBIT 2

August 25, 2014

Therefore, in addition to investigating the merits of the unfair labor practice allegations, the Board agent will also inquire into those factors relevant to making a determination as to whether or not 10(j) injunctive relief is appropriate in this case. Accordingly, please include your position on the appropriateness of Section 10(j) relief when you submit your evidence relevant to the investigation.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor any request to place limitations on our use of position statements or evidence beyond those prescribed by the Freedom of Information Act and the Federal Records Act. Thus, we will not honor any claim of confidentiality except as provided by Exemption 4 of FOIA, 5 U.S.C. Sec. 552(b)(4), and any material you submit may be introduced as evidence at any hearing before an administrative law judge. We are also required by the Federal Records Act to keep copies of documents gathered in our investigation for some years after a case closes. Further, the Freedom of Information Act may require that we disclose such records in closed cases upon request, unless there is an applicable exemption. Examples of those exemptions are those that protect confidential financial information or personal privacy interests.

Procedures: We strongly urge everyone to submit all documents and other materials (except unfair labor practice charges and representation petitions) by E-Filing (not e-mailing) through our website, www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. NLRB Form 4541 offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

August 25, 2014

Very truly yours,

A handwritten signature in black ink, appearing to read "David E. Leach". The signature is fluid and cursive, with a large initial "D" and a stylized "L".

DAVID E. LEACH
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M CONSULTANCY

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, state under oath that on August 25, 2014, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

August 25, 2014

Date

ANETT RODRIGUES, Designated Agent
of NLRB

Name

Signature

UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC
Charged Party
and
MED-LIFE M&M CONSULTANCY
Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, state under oath that on August 25, 2014, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

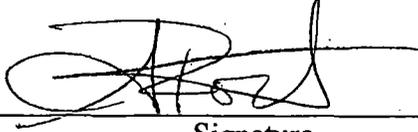
ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

August 25, 2014

_____ Date

ANETT RODRIGUES, Designated Agent
of NLRB

_____ Name



_____ Signature

UNITED STATES OF AMERICA
 NATIONAL LABOR RELATIONS BOARD
FIRST AMENDED CHARGE AGAINST EMPLOYER

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	10/9/14

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel. No. (908)718-5196
		c. Cell No.
d. Address (street, city, state ZIP code) 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036 and; 9 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271	e. Employer Representative ROY SANTOS	f. Fax No. (908)275-3548
		g. e-Mail
		h. Dispute Location (City and State) LINDEN, NJ
i. Type of Establishment (factory, nursing home, hotel) Transportation	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 70

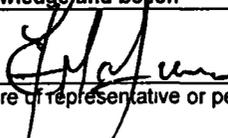
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)
 See attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
 MED-LIFE M&M CONSULTANCY

4a. Address (street and number, city, state, and ZIP code) 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112	4b. Tel. No. (732)900-3169
	4c. Cell No.
	4d. Fax No.
	4e. e-Mail

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	Tel. No. (732)900-3169
By:  (signature of representative or person making charge)	Office, if any, Cell No.
ERIC McLEMORE, President Print Name and Title	Fax No.
Address: 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112	e-Mail
Date: 10/9/14	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
 PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act (“the Act”) as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted benefits and promotion to employees if they did not support a union.
 - (d) Threatened employees with job loss and reduced compensation if they supported a union.
 - (e) Threatened to close the facility if employees elected a union as their bargaining representative.
 - (f) Told employees that selecting a union representative would be futile.
 - (g) Told employees that their benefits had been changed because they elected a union.
 - (h) Engaged in surveillance of employees’ union activities.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC (“GTS”) operated ROL Ambulance, LLC (“ROL”) as a disguised continuation or “alter-ego,” and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Jenita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) In about early August, 2014, discharged Arslan Mobarak.
 - (f) In about early August, 2014, issued a warning to Jhon Jaramillo.
 - (g) In about August, 2014, increased employee contributions toward medical insurance.
 - (h) On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsliechter.
 - (j) On about August 22, 2014, issued warnings and suspended Farah Gonzalez.
 - (k) On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
 - (l) On about September 7, 2014, issued a final warning to Farah Gonzalez.
 - (m) On about September 10, 2014, issued a warning to Sherman Francis.
 - (n) On about September 26, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with Med-Life M&M Consultancy (the “Union”) as follows:
 - (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union’s ability to represent unit employees.
 - (b) Since about August 7, 2014, failed to notify and bargain with the Union over the assignment of bargaining unit work to non-unit ROL employees.
 - (c) Since about August 7, 2014, failed to notify and bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



Download
NLRB
Mobile App

October 15, 2014

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

Re: GTS AMBULANCE TRANSPORTATION,
LLC
Case 22-CA-135312

Dear Mr. SANTOS:

Enclosed is a copy of the first amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If the agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

Very truly yours,

DAVID E. LEACH III
Regional Director

Enclosure: Copy of first amended charge

EXHIBIT 5

GTS AMBULANCE TRANSPORTATION, - 2 -
LLC
Case 22-CA-135312

October 15, 2014

cc: CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M CONSULTANCY

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on October 15, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

October 15, 2014

Date

Heeral Mody, Designated Agent of NLRB

Name

Signature

UNITED STATES OF AMERICA
 NATIONAL LABOR RELATIONS BOARD
SECOND AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	11/12/2014

INSTRUCTIONS:

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel. No. (908)718-5196	
		c. Cell No.	
d. Address (street, city, state ZIP code) GTS Ambulance Transportation, LLC 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036		e. Employer Representative ROY SANTOS	
ROL Ambulance, LLC 9 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271		f. Fax No. (908)275-3548	
		g. e-Mail	
		h. Dispute Location (City and State) LINDEN, NJ	
i. Type of Establishment (factory, nursing home, hotel) Transportation		j. Principal Product or Service Medical Transportation	
		k. Number of workers at dispute location 65	
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attached			
3 Full name of party filing charge (if labor organization, give full name, including local name and number) MED-LIFE M&M CONSULTANCY			
4a. Address (street and number, city, state, and ZIP code) 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112		4b. Tel. No. (732)900-3169	
		4c. Cell No.	
		4d. Fax No.	
		4e. e-Mail	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)			
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No. (732)900-3169	
By: 		Office, if any, Cell No.	
(signature of representative or person making charge)		Print Name and Title ERIC McLEMORE, President	
Address: 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112		Date: 11/12/14	
		Fax No.	
		e-Mail	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
 PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

RECEIVED
NLRB-REGION 22
NEWARK, NJ

2014 NOV 12 PM 3: 12

EXHIBIT 7

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act (“the Act”) as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted benefits and promotion to employees if they did not support a union.
 - (d) Threatened employees with job loss and reduced compensation if they supported a union.
 - (e) Threatened to close the facility if employees elected a union as their bargaining representative.
 - (f) Told employees that selecting a union representative would be futile.
 - (g) Told employees that their benefits had been changed because they elected a union.
 - (h) Engaged in surveillance of employees’ union activities.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez.
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC (“GTS”) operated ROL Ambulance, LLC (“ROL”) as a disguised continuation or “alter-ego,” and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Jenita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) In about early August, 2014, discharged Arslan Mobarak.
 - (f) In about early August, 2014, issued a warning to Jhon Jaramillo.
 - (g) In about August, 2014, increased employee contributions toward medical insurance.
 - (h) On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsliechter.
 - (j) On about August 22, 2014, issued warnings and suspended Farah Gonzalez.
 - (k) On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
 - (l) On about September 7, 2014, issued a final warning to Farah Gonzalez
 - (m) On about September 10, 2014, issued a warning to Sherman Francis.
 - (n) On about September 26, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with Med-Life M&M Consultancy (the “Union”) as follows:
 - (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union’s ability to represent unit employees, , including information regard ROL, employees’ terms and conditions of employment, and adverse employment actions that GTS has taken against employees.
 - (b) Since about August 7, 2014, failed to notify and bargain with the Union over the assignment of bargaining unit work to non-unit ROL employees.
 - (c) Since about August 7, 2014, failed to notify and bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.
 - (d) Since about August 15, 2014, failing to meet at reasonable and regular times to bargain with the Union for a first collective bargaining agreement.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



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November 13, 2014

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950

Re: GTS AMBULANCE TRANSPORTATION,
LLC & ROL AMBULANCE, LLC
Case 22-CA-135312

Dear Mr. SANTOS:

Enclosed is a copy of the **second amended charge** that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If the agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the second amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

Very truly yours,

DAVID E. LEACH III
Regional Director

Enclosure: Copy of second amended charge

EXHIBIT 8

cc: CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**GTS AMBULANCE TRANSPORTATION, LLC
& ROL AMBULANCE LLC**

Charged Party

and

MED-LIFE M&M CONSULTANCY

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF SECOND AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on November 13, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

November 13, 2014

ANETT RODRIGUES, Designated Agent
of NLRB

Date

Name

Signature

1

1

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**GTS AMBULANCE TRANSPORTATION, LLC
& ROL AMBULANCE LLC**
Charged Party

and

MED-LIFE M&M CONSULTANCY
Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF SECOND AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on November 13, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950

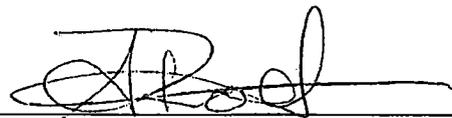
CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

November 13, 2014

Date

ANETT RODRIGUES, Designated Agent
of NLRB

Name



Signature

UNITED STATES OF AMERICA
 NATIONAL LABOR RELATIONS BOARD
THIRD AMENDED CHARGE AGAINST EMPLOYER

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	DEC 29, 2014

File an original of this charge with HRLRB Regional Director in which the alleged unfair labor practice occurred or is occurring

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel No (908)718-5198
d. Address (street, city, state ZIP code) GTS Ambulance Transportation, LLC 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036 ROL Ambulance, LLC 8 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271		c. Call No f. Fax No (908)275-3548
e. Employer Representative ROY SANTOS		g. e-Mail h. Dispute Location (City and State) LINDEN, NJ
i. Type of Establishment (factory, nursing home, hotel) Transportation	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 65

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

MED-LIFE M&M CONSULTANCY

4a. Address (street and number, city, state, and ZIP code) 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112	4b. Tel. No. (732)900-3169
	4c. Call No
	4d. Fax No
	4e. e-Mail

4. Full name of National or International labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel No (732)900-3169
ERIC McLEMORE, President		Office, if any, Call No.
Print Name and Title		Fax No
Date:		e-Mail

STATEMENT OF FACTS AND THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Information collected by the NLRB is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to process unfair labor practice and related proceedings or litigation. The routine uses for the information are fully described in the NLRB's Privacy Policy, dated December 13, 2006. The NLRB will further explain these uses upon request. Disclosure of this information to the public will cause the NLRB to decline to invoke its processes.

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act ("the Act") as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted benefits and promotion to employees if they did not support a union.
 - (d) Threatened employees with job loss and reduced compensation if they supported a union.
 - (e) Threatened to close the facility if employees elected a union as their bargaining representative.
 - (f) Told employees that selecting a union representative would be futile.
 - (g) Told employees that their benefits had been changed because they elected a union.
 - (h) Engaged in surveillance of employees' union activities.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez.
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC ("GTS") operated ROL Ambulance, LLC ("ROL") as a disguised continuation or "alter-ego," and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Jenita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) In about early August, 2014, discharged Arslan Mobarak.
 - (f) In about early August, 2014, issued a warning to Jhon Jaramillo.
 - (g) In about August, 2014, increased employee contributions toward medical insurance.
 - (h) On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsliechter.
 - (j) On about August 15 and August 22, 2014, issued warnings to and suspended Fara Gonzalez.
 - (k) On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
 - (l) On about September 7, 2014, issued a final warning to Fara Gonzalez.
 - (m) On about September 10, 2014, issued a warning to Sherman Francis.
 - (n) On about September 26, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.
 - (o) On about October 7, November 17, November 30, 2014, issued warnings to Fara Gonzalez.
 - (p) In about December, 2014, discharged Mathew Lee.
 - (q) On about December 2, 2014, discharged Phil Pais.
 - (r) On about December 12, 2014, issued warnings to multiple employees for lateness.

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with Med-Life M&M Consultancy (the "Union") as follows:
 - (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union's ability to represent unit employees, including information regard ROL, employees' terms and conditions of employment, and adverse employment actions that GTS has taken against employees.

-
- (b) Since about August 7, 2014, failed to notify and bargain with the Union over the assignment of bargaining unit work to non-unit ROL employees.
 - (c) Since about August 7, 2014, failed to notify and bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.
 - (d) Since about August 15, 2014, failing to meet at reasonable and regular times to bargain with the Union for a first collective bargaining agreement.
 - (e) Since about December 12, 2014, without notifying and giving the Union a chance to bargain, has unilaterally implemented a harsher and more rigid policy with regard to employee lateness.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



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December 29, 2014

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

ROL AMBULANCE, LLC
9 Concord Way
Morris Plains, NJ 07950-1271

Re: GTS AMBULANCE TRANSPORTATION,
LLC & ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

Dear Mr. SANTOS:

Enclosed is a copy of the Third Amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If the agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the Third Amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

GTS AMBULANCE TRANSPORTATION, - 2 -
LLC & ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

December 29, 2014

Very truly yours,

A handwritten signature in black ink, appearing to read "David E. Leach III". The signature is written in a cursive style with a large initial "D" and a stylized "L".

DAVID E. LEACH III
Regional Director

Enclosure: Copy of third amended charge

cc: CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF THIRD AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on December 29, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

ROL AMBULANCE, LLC
9 Concord Way
Morris Plains, NJ 07950-1271

December 29, 2014

Date

ALBERT SANTIAGO, Designated Agent
of NLRB

Name

ALBERT SANTIAGO

Signature

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC Charged Party and MED-LIFE M&M Charging Party	Case 22-CA-135312
---	--------------------------

AFFIDAVIT OF SERVICE OF THIRD AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on December 29, 2014, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

ROL AMBULANCE, LLC
9 Concord Way
Morris Plains, NJ 07950-1271

December 29, 2014

Date

ALBERT SANTIAGO, Designated Agent
of NLRB

Name

ALBERT SANTIAGO

Signature

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

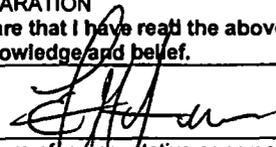
FOURTH AMENDED CHARGE AGAINST EMPLOYER

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	JAN 21, 2015

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel. No. (908)718-5196
		c. Cell No.
d. Address (street, city, state ZIP code) GTS Ambulance Transportation, LLC 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036	e. Employer Representative GTS ROY SANTOS (908)718-5196	f. Fax No. (908)275-3548
		g. e-Mail
ROL Ambulance, LLC 9 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271		h. Dispute Location (City and State) LINDEN, NJ
i. Type of Establishment (factory, nursing home, hotel) Transportation	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 65
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attached		
3. Full name of party filing charge (if labor organization, give full name, including local name and number) MED-LIFE M&M		
4a. Address (street and number, city, state, and ZIP code) 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112		4b. Tel. No. (732)900-3169
		4c. Cell No.
		4d. Fax No.
		4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)		
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No. (732)900-3169
By: 	ERIC McLEMORE, Union President	Office, if any, Cell No.
(signature of representative or person making charge)	Print Name and Title	Fax No.
Address: 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112	Date:	e-Mail

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, failure to supply the information will cause the NLRB to decline to invoke its processes.

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act (“the Act”) as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted benefits and promotion to employees if they did not support a union.
 - (d) Threatened employees with job loss and reduced compensation if they supported a union.
 - (e) Threatened to close the facility if employees elected a union as their bargaining representative.
 - (f) Told employees that selecting a union representative would be futile.
 - (g) Told employees that their benefits had been changed because they elected a union.
 - (h) Engaged in surveillance of employees’ union activities.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez.
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC (“GTS”) operated ROL Ambulance, LLC (“ROL”) as a disguised continuation or “alter-ego,” and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Jenita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) On about August 14, 2014, discharged Arslan Mobarak.
 - (f) On about July 30, 2014, issued a warning to Jhon Jaramillo.
 - (g) In about August, 2014, increased employee contributions toward medical insurance.
 - (h) On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsleichter.
 - (j) On about August 15, August 22, September 5, October 7, November 17, and November 28, 2014 issued warnings to and suspended Fara Gonzalez.
 - (k) On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
 - (l) On about September 10, 2014, issued a warning to Sherman Francis.
 - (m) On about September 24, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.
 - (n) On about December 1, 2014, discharged Jonathan Escobar.
 - (o) On about December 2, 2014, discharged Phil Pais.
 - (p) On about December 8, 2014, discharged Mathew Lee.
 - (q) Beginning about December 12, 2014, issued warnings to multiple employees for lateness.
 - (r) On about January 19, 2015, laid off employees.

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with Med-Life M&M (the “Union”) as follows:
 - (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union’s ability to represent unit employees, including information regard ROL, employees’ terms and conditions of employment, and adverse employment actions that GTS has taken against employees.

- (b) Since about August 7, 2014, failed to notify and bargain with the Union over the assignment of bargaining unit work to non-unit ROL employees.
- (c) Since about August 7, 2014, failed to notify and bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.
- (d) Since about August 15, 2014, failing to meet at reasonable and regular times to bargain with the Union for a first collective bargaining agreement.
- (e) Since about December 12, 2014, without notifying and giving the Union an opportunity to bargain, has unilaterally implemented a harsher and more rigid policy with regard to employee lateness.
- (f) On about January 9, 2014, without notifying and giving the Union an opportunity to bargain, unilaterally terminated employees' medical benefits.
- (g) On about January 19, 2015, without notifying and giving the Union an opportunity to bargain over the decision and effects of the decision, unilaterally laid off employees.

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF FOURTH AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on January 21, 2015, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE, STE 8
NEWARK, NJ 07102-5504

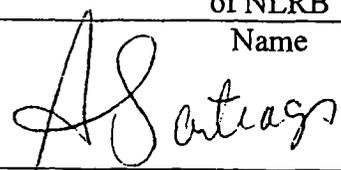
ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950-1271

January 21, 2015

Date

ALBERT SANTIAGO, Designated Agent
of NLRB

Name



Signature

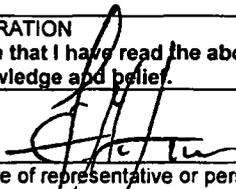
**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
FIFTH AMENDED CHARGE AGAINST EMPLOYER**

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	MARCH 11, 2015

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel. No. (908)718-5196
		c. Cell No.
d. Address (street, city, state ZIP code) GTS Ambulance Transportation, LLC 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036 ROL Ambulance, LLC 9 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271	e. Employer Representative GTS ROY SANTOS (908)718-5196	
	f. Fax No. (908)275-3548	
		g. e-Mail
		h. Dispute Location (City and State) LINDEN, NJ
i. Type of Establishment (factory, nursing home, hotel) Transportation	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 65
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attached		
3. Full name of party filing charge (if labor organization, give full name, including local name and number) MED-LIFE M&M		
4a. Address (street and number, city, state, and ZIP code) 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112		4b. Tel. No. (732)900-3169
		4c. Cell No.
		4d. Fax No.
		4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)		
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No. (732)900-3169
By:  (signature of representative or person making charge)	ERIC McLEMORE, Union President	Office, if any, Cell No.
Address: 15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112		Fax No.
Date: 3/11/15		e-Mail

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act (“the Act”) as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted benefits and promotion to employees if they did not support a union.
 - (d) Threatened employees with job loss and reduced compensation if they supported a union.
 - (e) Threatened to close the facility if employees elected a union as their bargaining representative.
 - (f) Told employees that selecting a union representative would be futile.
 - (g) Told employees that their benefits had been changed because they elected a union.
 - (h) Engaged in surveillance of employees’ union activities.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez.
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC (“GTS”) operated ROL Ambulance, LLC (“ROL”) as a disguised continuation or “alter-ego,” and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Jenita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) On about August 14, 2014, discharged Arslan Mobarak.
 - (f) On about July 30, 2014, issued a warning to Jhon Jaramillo.
 - (g) In about August, 2014, increased employee contributions toward medical insurance.
 - (h) On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsleichter.
 - (j) On about August 15, August 22, September 5, October 7, November 17, and November 28, 2014 issued warnings to and suspended Fara Gonzalez.
 - (k) On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
 - (l) On about September 10, 2014, issued a warning to Sherman Francis.
 - (m) On about September 24, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.
 - (n) On about December 1, 2014, discharged Jonathan Escobar.
 - (o) On about December 2, 2014, discharged Phil Pais.
 - (p) On about December 8, 2014, discharged Mathew Lee.
 - (q) Beginning about December 12, 2014, issued warnings to multiple employees for lateness.
 - (r) On about January 9, 2015, laid off employees.
 - (s) Since about January 9, 2015, refused to recall employees.

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with Med-Life M&M (the “Union”) as follows:

- (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union's ability to represent unit employees, including information regard ROL, employees' terms and conditions of employment, and adverse employment actions that GTS has taken against employees.
- (b) Since about August 7, 2014, failed to notify and bargain with the Union over the assignment of bargaining unit work to non-unit ROL employees.
- (c) Since about August 7, 2014, failed to notify and bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.
- (d) Since about August 15, 2014, failing to meet at reasonable and regular times to bargain with the Union for a first collective bargaining agreement.
- (e) Since about December 12, 2014, without notifying and giving the Union an opportunity to bargain, has unilaterally implemented a harsher and more rigid policy with regard to employee lateness.
- (f) On about January 9, 2014, without notifying and giving the Union an opportunity to bargain, unilaterally terminated employees' medical benefits.
- (g) On about January 19, 2015, without notifying and giving the Union an opportunity to bargain over the decision and effects of the decision, unilaterally laid off employees.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



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March 12, 2015

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC AND ROL AMBULANCE, LLC, ACTING
AS SINGLE EMPLOYER AND/ OR ALTER EGOS
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

VINCENT TROY SANTOS
9 Concord Way
Morris Plains, NJ 07950-1271

Re: GTS AMBULANCE TRANSPORTATION,
LLC & ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

Dear Mr. SANTOS, Mr. SANTOS:

Enclosed is a copy of the fifth amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If the agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the fifth amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

EXHIBIT 16

GTS AMBULANCE TRANSPORTATION, - 2 -
LLC & ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

March 12, 2015

Very truly yours,

A handwritten signature in black ink, appearing to read "David E. Leach III". The signature is fluid and cursive, with a large initial "D" and a stylized "L".

DAVID E. LEACH III
Regional Director

Enclosure: Copy of fifth amended charge

cc: CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

))

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**GTS AMBULANCE TRANSPORTATION, LLC
AND ROL AMBULANCE, LLC, ACTING AS
SINGLE EMPLOYER AND/ OR ALTER EGOS**

Charged Party

and

MED-LIFE M&M

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF FIFTH AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on March 12, 2015, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC AND ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYER AND/
OR ALTER EGOS
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

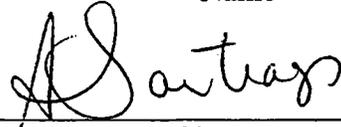
VINCENT TROY SANTOS
9 Concord Way
Morris Plains, NJ 07950-1271

March 12, 2015

ALBERT SANTIAGO, Designated Agent
of NLRB

Date

Name



Signature

UNITED STATES OF AMERICA
 NATIONAL LABOR RELATIONS BOARD
SIXTH AMENDED CHARGE AGAINST EMPLOYER

INSTRUCTIONS:

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
22-CA-135312	5/21/2015

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer GTS AMBULANCE TRANSPORTATION, LLC and ROL AMBULANCE, LLC, acting as Single Employers and/or Alter Egos		b. Tel. No. (908)718-5196
		c. Cell No.
d. Address (street, city, state ZIP code) GTS Ambulance Transportation, LLC 1717 PENNSYLVANIA AVENUE, LINDEN, NJ 07036 ROL Ambulance, LLC 9 CONCORD WAY, MORRIS PLAINS, NJ 07950-1271	e. Employer Representative GTS ROY SANTOS (908)718-5196 ROL VINCENT TROY SANTOS (201) 572-4893	f. Fax No. (908)275-3548
		g. e-Mail
		h. Dispute Location (City and State) LINDEN, NJ
i. Type of Establishment (factory, nursing home, hotel) Transportation	j. Principal Product or Service Medical Transportation	k. Number of workers at dispute location 65

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See attached.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

MED-LIFE M&M

4a. Address (street and number, city, state, and ZIP code)
15 GOLDSMITH AVENUE, SUITE 21, NEWARK, NJ 07112

4b. Tel. No.
(732)900-3169

4c. Cell No.

4d. Fax No.

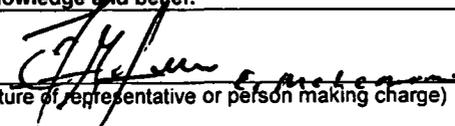
4e. e-Mail

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

Tel. No.
(732)900-3169

By: 
(signature of representative or person making charge)

ERIC McLEMORE,
Union President

Office, if any, Cell No.

Print Name and Title

Fax No.

Address: 15 GOLDSMITH AVENUE, SUITE
21, NEWARK, NJ 07112

Date: 5/21/15

e-Mail

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
 PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

2015 MAY 21 PM 4: 15

CLERK-REGION 22
NEWARK, NJ

EXHIBIT 18

1. Since about July, 2014, the above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(1) of the National Labor Relations Act (“the Act”) as follows:
 - (a) Interrogated employees regarding their union support and activities.
 - (b) Solicited grievances and promising to remedy them if employees did not support a union.
 - (c) Promised and granted employees better pay, benefits, promotion and other improved terms and conditions of employment if they did not support a union.
 - (d) Threatened employees with closure, job loss and reduced compensation if they supported a union.
 - (e) Threatened not to recall employees to work because of their union activities.
 - (f) Threatened employees with stricter work rules and harsher discipline if they elected a union as their bargaining representative.
 - (g) Told employees that selecting a union representative would be futile.
 - (h) Engaged in surveillance of employees’ union activities.
 - (i) Created the impression among employees that their union activities were under surveillance.

2. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(3) of the Act by discriminating against employees for supporting a union and engaging in union activity and/or violated Section 8(a)(5) by refusing to notify and offer to bargain with the Med-Life M&M (the “Union”) as follows:
 - (a) Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo and Ian Henry.
 - (b) Since about July, 2014, Employer GTS Ambulance Transportation, LLC (“GTS”) operated ROL Ambulance, LLC (“ROL”) as a disguised continuation or “alter-ego,” and has transferred part of its operation to ROL, including work previously performed by GTS employees.
 - (c) On about July 20, 2014, discharged Janita Dunn.
 - (d) On about July 25, 2014, discharged Jamal Woltz.
 - (e) On about July 30, 2014, issued a warning to Jhon Jaramillo.
 - (f) In about August, 2014, established a new policy of posting monthly schedules.
 - (g) On about August 14, 2014, discharged Arslan Mobarak.
 - (h) On about August 15, 2014, demoted and reduced the pay of Ceilia Valente.
 - (i) On about August 15, 2014, issued a final warning to Doug Gelsleichter.
 - (j) On about August 19, 2014, discharged Ian Henry.
 - (k) On about August 22, September 5, October 3, 2014 issued warnings to and suspended Fara Gonzalez.
 - (l) On about September 10, 2014, issued a warning to Sherman Francis.
 - (m) On about September 24, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.
 - (n) On about November 29, 2014, issued a final warning to Mathew Lee.
 - (o) On about December 1, 2014, discharged Jonathan Escobar.
 - (p) On about December 2, 2014, discharged Phil Pais.
 - (q) On about December 8, 2014, discharged Mathew Lee.
 - (r) Beginning about December 12, 2014, issued warnings to multiple employees for lateness.
 - (s) On about January 19, 2015, laid off employees.
 - (t) Since about January 19, 2015, refused to recall employees.

2015 MAY 21 PM 4: 15

NEWARK, NJ
MAY 22 10 22 AM '15

EXHIBIT 18

3. The above-referenced Employers, by their officers, agents and representatives, have violated Section 8(a)(5) of the Act by failing to bargain in good-faith with the Union as follows:
- (a) Since about September 13, 2014, failed to provide information that is relevant and necessary to the Union's ability to represent unit employees, including information regarding ROL, employees' terms and conditions of employment, various adverse employment actions that GTS has taken against employees, layoffs, recalls, a seniority list, and the Employers' availability to attend bargaining sessions.
 - (b) Since about August 7, 2014, failed to notify and offer to bargain with the Union over the wages, hours and other terms and conditions of employment of ROL employees.
 - (c) Since about December 11, 2014, failed to meet at reasonable and regular times to bargain with the Union for a collective bargaining agreement.
 - (d) Since about December 12, 2014, without notifying and offering to bargain with the Union, unilaterally implemented a harsher and more rigid policy with regard to employee lateness.
 - (e) On about January 19, 2015, without notifying and giving the Union an opportunity to bargain over the decision and effects of the decision, unilaterally laid off employees.
 - (f) Since about January 19, 2015, without notifying and giving the Union an opportunity to bargain, recalled some employees to work and refused to recall others.
 - (g) On about February 1, 2015, without notifying and giving the Union an opportunity to bargain, unilaterally terminated employees' medical benefits.

RECEIVED
NLRB-REGION 22
NEWARK, NJ

2015 MAY 21 PM 4:15

EXHIBIT 18



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852



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May 22, 2015

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION,
LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

VINCENT TROY SANTOS
ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950-1271

Re: GTS AMBULANCE TRANSPORTATION,
LLC & ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

Dear Mr. SANTOS, Mr. SANTOS:

Enclosed is a copy of the sixth amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney BENJAMIN W. GREEN whose telephone number is (973)645-6453. If the agent is not available, you may contact Deputy Regional Attorney DOROTHY FOLEY whose telephone number is (973)645-6376.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the sixth amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Procedures: Your right to representation, the means of presenting evidence, and a description of our procedures, including how to submit documents, was described in the letter sent to you with the original charge in this matter. If you have any questions, please contact the Board agent.

Very truly yours,

DAVID E. LEACH III
Regional Director

Enclosure: Copy of sixth amended charge

GTS AMBULANCE TRANSPORTATION,
LLC & ROL AMBULANCE, LLC, ACTING
AS SINGLE EMPLOYERS AND/OR ALTER
EGOS.
Case 22-CA-135312

- 2 -

May 22, 2015

cc: CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF SIXTH AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on May 22, 2015, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI. PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

VINCENT TROY SANTOS
ROL AMBULANCE, LLC
9 Concord Way
Morris Plains, NJ 07950-1271

May 22, 2015

ANETT RODRIGUES, Designated Agent
of NLRB

Date

Name

Signature

UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

GTS AMBULANCE TRANSPORTATION, LLC

Charged Party

and

MED-LIFE M&M

Charging Party

Case 22-CA-135312

AFFIDAVIT OF SERVICE OF SIXTH AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on May 22, 2015, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

CYNTHIA RINGELL, ESQ.
JANINSKI, PC
60 PARK PLACE
STE 8
NEWARK, NJ 07102-5504

VINCENT TROY SANTOS
ROL AMBULANCE, LLC
9 Concord Way
Morris Plains, NJ 07950-1271

May 22, 2015

Date

ANETT RODRIGUES, Designated Agent
of NLRB

Name



Signature

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 22**

**GTS AMBULANCE TRANSPORTATION, LLC AND ROL
AMBULANCE, LLC, as single employers and/or alter egos**

and

Case 22-CA-135312

MED-LIFE M&M

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Med-Life M&M (“the Union”). It is issued pursuant to Section 10(b) of the National Labor Relations Act (“the Act”), 29 U.S.C. § 151 et seq., and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (“the Board”) and alleges that Respondent GTS Ambulance Transportation, LLC (“Respondent GTS”) and Respondent ROL Ambulance, LLC (“Respondent ROL”), as single employers or alter-egos (collectively referred to herein as “Respondent”), have violated the Act as described below.

1. (a) The charge in this proceeding was filed by the Union on August 25, 2014, and a copy was served on Respondent GTS by U.S. mail on August 25, 2014.

(b) The first amended charge in this proceeding was filed by the Union on October 9, 2014, and a copy was served on Respondent by U.S. mail on October 15, 2014.

(c) The second amended charge in this proceeding was filed by the Union on November 12, 2014, and a copy was served on Respondent by U.S. mail on November 13, 2014.

(d) The third amended charge in this proceeding was filed by the Union on December 29, 2014, and a copy was served on Respondent by U.S. mail on December 29, 2014.

(e) The fourth amended charge in this proceeding was filed by the Union on January 21, 2014, and a copy was served on Respondent by U.S. mail on January 21, 2015.

(f) The fifth amended charge in this proceeding was filed by the Union on March 11, 2015, and a copy was served on Respondent by U.S. mail on March 12, 2015.

(g) The sixth amended charge in this proceeding was filed by the Union on May 21, 2015, and a copy was served on Respondent by U.S. mail on May 22, 2015.

2. At all material times, Respondent GTS has been a limited liability company with an office and place of business in Linden, New Jersey (“GTS facility”) and has been furnishing ambulance and mobility assistance vehicle (“MAV”) transportation services.

3. Since about July, 2014, at which time Respondent ROL commenced its operations, and continuing to date, Respondent ROL has been a limited liability company with an office and place of business in Linden, New Jersey (“ROL facility”) and has been furnishing ambulance transportation services.

4. (a) At all material times, Respondent GTS and Respondent ROL have been affiliated business enterprises with common officers, ownership, directors, management, and supervision; have formulated and administered a common labor policy; have shared common premises and facilities; have provided services for and made sales to each other; have interchanged personnel with each other; have interrelated operations with common clients, supplies, equipment and forms; and have held themselves out to the public as a single-integrated business enterprise.

(b) At all material times, Respondent GTS and Respondent ROL have had substantially identical management, business purposes, operations, equipment, customers, and supervision, and ownership.

(d) About July, 2014, Respondent ROL was established by Respondent GTS, as a disguised continuation of Respondent GTS.

(e) Respondent GTS established Respondent ROL, as described above in paragraph 4(d), for the purpose of evading its responsibilities under the Act.

(f) Based on the operations and conduct described above in paragraphs 4(a) through 4(e), Respondent GTS and Respondent ROL are, and have been at all material times, alter egos and a single employer within the meaning of the Act.

5. (a) In conducting its operations during the 12-month period ending April 30, 2015, Respondent derived gross revenues in excess of \$250,000.

(b) During the period of time described above in paragraph 5(a), Respondent purchased and received at its Linden, New Jersey facilities goods valued in excess of \$5,000 directly from points outside the State of New Jersey.

6. At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

7. (a) The Union is an organization in which employees participate, and which exists for the purpose, in whole or in part, of dealing with employers concerning grievances, labor disputes, and terms and conditions of employment.

(b) At all material times, based on the facts described above in 7(a), the Union has been a labor organization within the meaning of Section 2(5) of the Act.

8. At all material times, the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act):

Roy Santos	-	Shareholder and Officer of Respondent GTS
Glenn Santos	-	Shareholder and Officer of Respondent GTS
Troy Santos	-	Shareholder and officer of Respondent ROL
Tricia Solon	-	Respondent GTS Operations Manager & Respondent ROL Office Manager
Maria Robins	-	Scheduler
Ruben Martinez, Jr.	-	EMT Supervisor
Maloney Santianna	-	Dispatch Manager
Mario Milaq	-	Payroll Manager and Dispatcher
Mark Milaq	-	Dispatcher

9. On August 15, 2015, the Board certified the Union as the exclusive collective bargaining representative of the following unit:

All full-time and regular part-time EMTS and MAV drivers employed by Respondent GTS at its Linden, New Jersey facility, but excluding all dispatchers, clerks, maintenance mechanics and janitors, guards, managers and supervisors as defined in the Act.

10. (a) The following employees of Respondent (“the Unit”) constitute a unit appropriate for the purposes of collective bargaining within the meaning of Section 9(b) of the Act:

All full-time and regular part-time EMTS and MAV drivers employed by Respondent at its Linden, New Jersey facilities, but excluding all dispatchers, clerks, maintenance mechanics and janitors, guards, managers and supervisors as defined in the Act.

(b) About August 7, 2015, a majority of the Unit described above in subparagraph (a) designated the Union as their exclusive collective-bargaining representative.

(c) At all times since August 7, based on Section 9(a) of the Act, the Union has been the exclusive collective-bargaining representative of the Unit.

11. On about June 24, 2014, Respondent by Roy Santos and Ruben Martinez, Jr., at an Applebee's in Linden, New Jersey, engaged in surveillance of employees union activities.

12. Respondent, by Roy Santos, at the GTS facility:

(a) On about June 24, 2014, interrogated its employees about their union sympathies.

(b) In about late-July, 2014, threatened its employees with closure of the facility and job loss if they selected the Union as their bargaining representative.

(c) On about June 24, 2014, by telling employees that the union would not be able to help or do anything for, informed its employees that it would be futile for them to select the Union as their bargaining representative.

(d) On about June 24, 2014, promised its employees improved pay if the employees rejected the Union as their bargaining representative.

(e) In about early-July, 2014, interrogated its employees about their union sympathies.

(f) In about early-July, 2014, by telling employees that the union would not be able to help and that the Respondent can discharge whoever it wants, informed its employees that it would be futile for them to select the Union as their bargaining representative.

(g) On about July 13, 2014, threatened its employees with closure of the facility and job loss if they selected the Union as their bargaining representative.

(h) On about July 13, 2014, promised its employees to pay their medical bills, hold Christmas parties, and post monthly schedules if the employees rejected the Union as their bargaining representative.

(i) On about July 13, 2014, by soliciting employee complaints and grievances, promised its employees increased benefits and improved terms and conditions of employment if the employees rejected the Union as their bargaining representative.

(j) On about July 13, 2014, promised to promote employees if they rejected the Union as their bargaining representative.

(k) On about July 14, 2014, interrogated its employees about their Union sympathies and activities.

(l) On about July 14, 2014, by impliedly telling employees that management was aware of their Union activities and sympathies, created an impression among its employees that their union activities were under surveillance by Respondent.

(m) On about July 14, 2014, by telling employees that the Union would not be able to help or do anything for them, informed its employees that it would be futile for employees to select the Union as their bargaining representative.

(n) In about late-July, 2014, interrogated its employees about their Union sympathies.

(o) In about late-July, 2014, threatened its employees with stricter work rules and harsher discipline, including discharge, if they selected the Union as their bargaining representative.

(p) In about early-August, 2014, by impliedly telling employees that management was aware of their Union sympathies, created an impression among its employees that their union activities were under surveillance by Respondent.

(q) In about early-August, 2014, by telling employees that the union would not be able stop an employee from being disciplined or discharge, informed its employees that it would be futile for them to select the Union as their bargaining representative.

(r) In about early-August, 2014, promised its employees better pay and paid time off if they rejected the Union as their bargaining representative.

13. On about late-July, 2014, Respondent, by Tricia Solon, interrogated its employees about their Union sympathies.

14. In about late-February, 2015, Respondent, by Glenn Santos, threatened not to recall employees to work because of their Union sympathies.

15. In about July, 2014, Respondent assigned work previously performed by its employees to employees of Respondent ROL.

16. Respondent engaged in the conduct described above in paragraph 15 because employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

17. On about the dates set forth opposite their names, Respondent took the following adverse employment actions against the employees named below:

Paragraph	Date	Employee	Adverse Action
a)	July 20, 2014	Janita Dunn	Discharge
b)	July 28, 2014	Jamal Woltz	Discharge
c)	July 30, 2014,	Jhon Jaramillo	Written Warning

d)	August, 2014	Jhon Jaramillo	Reduced Work Hours
e)	August, 2014	Ian Henry	Reduced Work Hours
f)	August 14, 2014	Arslan Mobarak	Discharge
g)	August 15, 2014	Doug Gelsleichter	Written Warning
h)	August 15, 2014	Celia Valente	Demoted from Driver to Tech
i)	August 19, 2014	Ian Henry	Discharge
j)	August 22, 2014	Fara Gonzalez	Written Warnings & Suspension
k)	September 5, 2014	Fara Gonzalez	Final Warning
l)	September 10, 2014	Sherman Francis	Written Warning
m)	September 24, 2014	Sherman Francis	Suspension
n)	September 24, 2014	Philip Pais	Suspension
o)	October 3, 2014	Fara Gonzalez	Written Warning
p)	November 29, 2014	Mathew Lee	Final Warning
q)	December 1, 2014	Jonathan Escobar	Discharge
r)	December 2, 2014	Philip Pais	Discharge
s)	December 8, 2014	Mathew Lee	Discharge

18. Respondent engaged in the conduct described above in paragraphs 17(a) to 17(j), 17(m), 17(n), and 17(q) to 17(s) because the named employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

19. (a) The subjects set forth above in paragraphs 17(c) through 17(s) relate to wages, hours and other terms and conditions of employment of the Unit and are mandatory subjects for purposes of collective bargaining.

(b) Respondent engaged in the conduct described above in paragraphs 17(c) through 17(s) without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent with respect to this conduct.

20. In about August, 2014, Respondent established a new policy of posting monthly schedules instead of calling employees a day in advance to inform them of their shifts.

21. Respondent engaged in the conduct described above in paragraph 20 because employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities

22. On about December 12, 2014, Respondent imposed a more onerous attendance policy and issued discipline to employees pursuant to that policy.

23. Respondent engaged in the conduct described above in paragraph 22 because the employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

24. (a) The subjects set forth above in paragraph 22 relates to wages, hours and other terms and conditions of employment of the Unit and are mandatory subjects for purposes of collective bargaining.

(b) Respondent engaged in the conduct described above in paragraph 22 without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent with respect to this conduct.

25. On about February 1, 2015, Respondent terminated the medical benefits of Unit employees.

26. (a) The subject set forth above in paragraph 25 relates to wages, hours and other terms and conditions of employment of the Unit and is a mandatory subject for purposes of collective bargaining.

(b) Respondent engaged in the conduct described above in paragraph 25 without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent with respect to this conduct.

27. On about January 19, 2015, Respondent laid off Unit employees, including Celia Valente.

28. Respondent engaged in the conduct described above in paragraph 27 because the employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

29. (a) The subject set forth above in paragraph 27 relates to wages, hours and other terms and conditions of employment of the Unit and is a mandatory subject for purposes of collective bargaining.

(b) Respondent engaged in the conduct described above in paragraph 27 without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent with respect to the decision and effects of this conduct.

30. Since about January 19, 2015, Respondent has recalled some employees to work and has refused to recall other employees, including Jhon Jaramillo, Fara Gonzalez, Alexander Goncalvez, Celia Valente and Melvin Sanchez.

31. Respondent engaged in the conduct described above in paragraph 30 because the employees of Respondent joined and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

32. (a) The subject set forth above in paragraph 30 relates to wages, hours and other terms and conditions of employment of the Unit and is a mandatory subject for purposes of collective bargaining.

(b) Respondent engaged in the conduct described above in paragraph 30 without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent with respect to this conduct.

33. (a) From October 9, 2014 to December 11, 2014, Respondent and the Union met for the purposes of collective bargaining.

(b) At all material times, the Union has been the Union's collective-bargaining agent during these negotiations.

(c) Since about December 11, 2014, Respondent has refused to meet and bargain with the Union regarding a collective bargaining agreement and other mandatory subjects of bargaining.

34. (a) Since about September 13, 2015, the Union has requested in writing that Respondent furnish the Union with the following information: Contracts with nursing facilities, patient applications, patient care reports, daily log sheets, and billing records.

(b) The information requested by the Union, as described above in paragraph 34(a) is necessary for, and relevant to, the Union's performance of its duties as the exclusive collective bargaining representative of the Unit.

(c) Since about September 17, 2014, Respondent, in writing, by attorney Cynthia Ringell, Esq., failed and refused to furnish the Union with the information requested by it as described above in paragraph 34(a).

35. (a) Since about September 23, 2015, the Union has requested in writing that Respondent furnish the Union with employees' personnel files.

(b) The information requested by the Union, as described above in paragraph 35(a) is necessary for, and relevant to, the Union's performance of its duties as the exclusive collective bargaining representative of the Unit.

(c) Since about September 23, 2014, Respondent has failed and refused to furnish the Union with the information requested by it as described above in paragraph 35(a).

36. (a) Since about October 10, 2014, the Union, in writing, has requested that Respondent furnish the Union with information as proved in the e-mail attached hereto as Exhibit A.

(b) The information requested by the Union, as described above in paragraph 36(a) is necessary for, and relevant to, the Union's performance of its duties as the exclusive collective bargaining representative of the Unit.

(c) Since about October 10, 2014, Respondent, in writing, by attorney Cynthia Ringell, Esq., has failed and refused to furnish the Union with the information requested by it as described above in paragraph 36(a).

37. (a) Since about February 16, 2015, the Union, in writing, has requested that Respondent furnish the Union with information as provided in the e-mail attached hereto as Exhibit B.

(b) The information requested by the Union, as described above in paragraph 37(a) is necessary for, and relevant to, the Union's performance of its duties as the exclusive collective bargaining representative of the Unit.

(c) Since about February 16, 2014, Respondent has failed and refused to furnish the Union with the information requested by it as described above in paragraph 37(a).

38. By the conduct described above in paragraphs 11 to 14, Respondent has been interfering with, restraining, and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

39. By the conduct described above in paragraphs 15, 16, 17(a) to 17(h), 17(j) to 17(p), 17(s), 20 to 23, 27, 28, 30 and 31, Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(1) and (3) of the Act.

40. By the conduct described above in paragraphs 17(c) through 17(s), 22, 24 to 27, 29, 30, and 32 to 37, Respondent has been failing and refusing to bargain collectively and in good faith with the exclusive collective-bargaining representative of its employees in violation of Section 8(a)(1) and (5) of the Act.

41. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

REMEDY

As part of the remedy for the unfair labor practices alleged above in paragraphs 17(a), 17(b), 17(d) to 17(f), 17(h) to 17(j), 17(m), 17(n), 17(q) to 17(s), and 27 through 32, the General Counsel seeks an order requiring reimbursement of amounts equal to the difference in taxes owed upon receipt of a lump-sum payment and taxes that would have been owed had there been no discrimination.

The General Counsel further seeks, as part of the remedy for the allegations in paragraphs 17(a), 17(b), 17(d) to 17(f), 17(h) to 17(j), 17(m), 17(n), 17(q) to 17(s), and 27 through 32, that

Respondent be required to submit the appropriate documentation to the Social Security Administration so that when backpay is paid, it will be allocated to the appropriate periods. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

As part of the remedy for the unfair labor practices alleged above in paragraph 33, the General Counsel seeks an Order requiring Respondent to: (1) bargain on request within 15 days of a Board Order; (2) bargain on request for a minimum of 15 hours a week until an agreement or lawful impasse is reached or until the parties agree to a respite in bargaining; (3) prepare written bargaining progress reports every 15 days and submit them to the Regional Director and also serve the reports on the Union to provide the Union with an opportunity to reply; and (4) make whole employee negotiators for any earnings lost while attending bargaining sessions. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

As part of the remedy for Respondent's unfair labor practice alleged above in paragraph 33, the General Counsel seeks an Order requiring Respondent to bargain in good faith with the Union, on request, for the period required by *Mar-Jac Poultry Co.*, 136 NLRB 785 (1962), as the recognized bargaining representative in the appropriate unit. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

As part of the remedy for the unfair labor practices alleged above in paragraphs 17(a), 17(b), 17(d), to 17(f), 17(h) to 17(j), 17(m), 17(n), 17(q) to 17(s) and 27 through 32, the General Counsel seeks an Order requiring that the Respondent reimburse discriminatees for all search-for-work and work-related expenses regardless of whether the discriminatees received interim

earnings in excess of these expenses, or at all, during any given quarter, or during the overall backpay period.

As part of the remedy for the unfair labor practices alleged above in paragraphs 27 to 32, the General Counsel seeks an order requiring that Respondent make whole employees in the Unit in the manner set forth in *F.W. Woolworth Co.*, 90 NLRB 289 (1950). Alternatively, as part of the remedy for the unfair labor practices alleged above in paragraphs 27 to 30, the General Counsel seeks an order requiring that Respondent make whole employees in the Unit in the manner set forth in *Transmarine Navigation Corp.*, 170 NLRB 389 (1968). The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the (consolidated) complaint. The answer must be **received by this office on or before July 13, 2015 or postmarked on or before July 12, 2015.** Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **File Case Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure

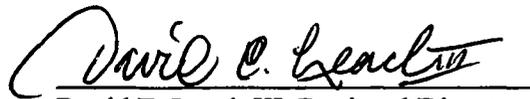
because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the (consolidated) complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **August 25, 2015 at 9:30 a.m.** at 20 Washington Place, 5th Floor, Newark, New Jersey 07102 and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this (consolidated) complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The

procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: June 29, 2015

A handwritten signature in black ink, reading "David E. Leach III", written over a horizontal line.

David E. Leach III, Regional Director
National Labor Relations Board
Region 22
20 Washington Place, 5th Floor
Newark, New Jersey 07102

----- Forwarded message -----
From: **Med-Life** <medlifeunion@gmail.com>
Date: Fri, Oct 10, 2014 at 9:18 AM
Subject: Information Request
To: Cynthia Ringel <cringel@jplawfirm.com>

Ms. Ringel

As per our meeting yesterday, we write to request any and all information related to the incidents below. Please attach any documentation that support the employer's position. Thank you for your assistance.

1. Since about June, 2014, reduced the hours and work opportunities of employees, including Jhon Jaramillo, Ian Henry, and Melvin Sanchez.
2. On about July 20, 2014, discharged Jenita Dunn.
3. On about July 25, 2014, discharged Jamal Woltz.
4. On about early August, 2014, discharged Arslan Mobarak.
5. On about early August, 2014, issued a warning to Jhon Jaramillo.
6. On about August, 2014, increased employee contributions toward medical insurance.
7. On about August 13, 2014, demoted and reduced the pay of Ceilia Valente.
8. On about August 15, 2014, issued a final warning to Doug Gelsliechter.
9. On about August 22, 2014, issued warnings and suspended Farah Gonzalez.
10. On about August 28, 2014, required Jhon Jaramillo to work with a partner who, by mutual request and agreement, he had been excluded from working with in the past.
11. On about September 7, 2014, issued a final warning to Farah Gonzalez
12. On about September 10, 2014, issued a warning to Sherman Francis.
13. On about September 26, 2014, issued warnings to and suspended Phil Pais and Sherman Francis.
14. Specify GTS Ambulance relationship with transportation company ROL.

--

Eric S. McLemore, Pres.
Med-Life M&M Union
Newark, NJ 07112
Ph: 1+732-900-3169
Ph: 1+201-644-6695
www.medlifeunion.com

This e-mail may be privileged and confidential attorney-client communication and is intended only for the use of the addressee(s) named above. If you are not the intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail message in error, please delete it from your system without copying it, and immediately notify the sender by replying to this message or by telephone.

This e-mail is not intended, nor shall it be deemed, unless otherwise expressly provided in writing, to (1) constitute or provide legal advice or counsel, or create an attorney-client relationship with the firm or me, unless the recipient already has an attorney-client relationship with the firm or me; or (2) contain my electronic signature (the typewritten signature included in this e-mail is not an "electronic signature" within the meaning of the Electronic Signatures in Global and National Commerce Act or any other law of similar import, including and without limitation, the Uniform Electronic Transactions Act, as the same may be enacted in any state). Statements made in this e-mail are not binding unless and until mutually satisfactory agreements memorializing the subject matter of the transmission are executed by hand and are exchanged between the parties to the agreement.

----- Forwarded message -----

From: "Medlife Union" <medlifeunion@gmail.com>

Date: Feb 16, 2015 3:38 PM

Subject: Information Request

To: <trc543@aol.com>

Cc:

Good Evening,

As per our telephone conversation today the following information is requested and required for Med- Life to properly represent bargaining unit employees.

This information is necessary to continue negotiations with GTS AMBULANCE LLC, in compliance with law, rule, regulation, and requirement set forth by the "NLRB" As such, the information is necessary and needed for the union to have full and proper discussion, understanding, and negotiation of the subject within the scope of bargaining so defined herein.

Requested documents are as follow:

1. Why was Roy Santos unavailable for previously scheduled bargaining session?
2. What is the reason for layoffs?
3. When and how were employees notified of layoff?
4. A list of all employees laid off;
5. When do you expect to recall employees?
6. Current seniority list;
7. Can employees file for unemployment?
8. Do you plan to contest employees' unemployment claims?
9. Are you willing to settle on some of the claims/ charges filed with the NLRB?
10. When are you available to meet for continued bargaining?

Please forward ALL documents by **February 20th 2014**. If any other documents are needed you will be notified.

Respectfully,

--

Med-Life M&M Union
Newark, NJ 07112
Ph: 1+732-900-3169
Ph: 1+201-644-6695
www.medlifeunion.com

This e-mail may be privileged and confidential attorney-client communication and is intended only for the use of the addressee(s) named above. If you are not the intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail message in error, please delete it from your system without copying it, and immediately notify the sender by replying to this message or by telephone.

This e-mail is not intended, nor shall it be deemed, unless otherwise expressly provided in writing, to (1) constitute or provide legal advice or counsel, or create an attorney-client relationship with the firm or me, unless the recipient already has an attorney-client relationship with the firm or me; or (2) contain my electronic signature (the typewritten signature included in this e-mail is not an "electronic signature" within the meaning of the Electronic Signatures in Global and National Commerce Act or any other law of similar import, including and without limitation, the Uniform Electronic Transactions Act, as the same may be enacted in any state). Statements made in this e-mail are not binding unless and until mutually satisfactory agreements memorializing the subject matter of the transmission are executed by hand and are exchanged between the parties to the agreement.

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 22

GTS AMBULANCE TRANSPORTATION, LLC &
ROL AMBULANCE, LLC, ACTING AS SINGLE
EMPLOYERS AND/OR ALTER EGOS.

and

Case 22-CA-135312

MED-LIFE M&M

AFFIDAVIT OF SERVICE OF: Complaint and Notice of Hearing (with forms NLRB-4338 and NLRB-4668 attached)

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **June 29, 2015**, I served the above-entitled document(s) by **certified or regular mail**, as noted below, upon the following persons, addressed to them at the following addresses:

CERTIFIED MAIL

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
1717 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

VINCENT TROY SANTOS
ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950-1271

ERIC MCLEMORE, PRESIDENT
MED-LIFE M&M
15 GOLDSMITH AVENUE
SUITE 21
NEWARK, NJ 07112

June 29, 2015

Date

Raquel Wilkinson, Designated Agent of
NLRB

Name



Signature

EXHIBIT 22



USPS Tracking™



Customer Service ›
Have questions? We're here to help.



Get Easy Tracking Updates ›
Sign up for My USPS.

Tracking Number: 70103090000146395800

Product & Tracking Information

Postal Product:

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
July 1, 2015, 11:55 am	Delivered	LINDEN, NJ 07036

Your item was delivered at 11:55 am on July 1, 2015 in LINDEN, NJ 07036.

July 1, 2015, 12:07 am	Departed USPS Facility	KEARNY, NJ 07099
June 29, 2015, 9:22 pm	Arrived at USPS Facility	KEARNY, NJ 07099
June 29, 2015, 5:13 pm	Departed Post Office	NEWARK, NJ 07102
June 29, 2015, 4:31 pm	Picked Up	NEWARK, NJ 07102

Available Actions

Text Updates

Email Updates

Track Another Package

Tracking (or receipt) number

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS ›



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- FOIA
- No FEAR Act EEO Data



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Have questions? We're here to help.



Get Easy Tracking Updates ›
Sign up for My USPS.

Tracking Number: 70103090000146395794

Product & Tracking Information

Postal Product:

Features:
Certified Mail™

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
July 20, 2015 , 5:14 am	Departed USPS Facility	TETERBORO, NJ 07699

Your item departed our USPS facility in TETERBORO, NJ 07699 on July 20, 2015 at 5:14 am. The item is currently in transit to the destination.

July 19, 2015 , 10:42 pm	Arrived at USPS Origin Facility	TETERBORO, NJ 07699
July 17, 2015 , 9:29 am	Unclaimed	MORRIS PLAINS, NJ 07950
July 1, 2015 , 12:21 pm	Notice Left (No Authorized Recipient Available)	MORRIS PLAINS, NJ 07950
June 30, 2015 , 3:32 pm	Notice Left (No Authorized Recipient Available)	MORRIS PLAINS, NJ 07950
June 30, 2015 , 8:10 am	Out for Delivery	MORRIS PLAINS, NJ 07950
June 30, 2015 , 8:00 am	Sorting Complete	MORRIS PLAINS, NJ 07950
June 30, 2015 , 7:50 am	Arrived at Unit	MORRIS PLAINS, NJ 07950
June 30, 2015 , 4:03 am	Departed USPS Facility	KEARNY, NJ 07099
June 29, 2015 , 9:22 pm	Arrived at USPS Origin Facility	KEARNY, NJ 07099
June 29, 2015 , 5:13 pm	Departed Post Office	NEWARK, NJ 07102
June 29, 2015 , 4:31 pm	Picked Up	NEWARK, NJ 07102

Available Actions

Track Another Package

Tracking (or receipt) number

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS ›



EXHIBIT 24



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 22
20 WASHINGTON PL
FL 5
NEWARK, NJ 07102-3127

Agency Website: www.nlr.gov
Telephone: (973)645-2100
Fax: (973)645-3852

July 14, 2015

ROY SANTOS, PRESIDENT
GTS AMBULANCE TRANSPORTATION, LLC
171 7 PENNSYLVANIA AVENUE
LINDEN, NJ 07036

VINCENT TROY SANTOS
ROL AMBULANCE, LLC
9 CONCORD WAY
MORRIS PLAINS, NJ 07950-1271

Re: GTS AMBULANCE
TRANSPORTATION, LLC
& ROL AMBULANCE, LLC,
ACTING AS SINGLE EMPLOYERS
AND/OR ALTER EGOS.
Case 22-CA-135312

Gentlemen:

A Complaint and Notice of Hearing in the above-captioned case was issued on June 29, 2015. The Complaint states that pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, the Respondent must file an answer and that the answer must be received by this office on or before July 13, 2015 or postmarked on or before July 12, 2015. To date, no answer has been received by this office.

This is to advise you that the time to file an answer has been extended until July 21, 2015. If an answer is not received by the close of business on that date, a Motion for Default Judgment will be filed.

Please feel free to call me at (973) 645-2259 if you have any questions in this matter.

Very truly yours,

/s/ Richard Fox

Richard Fox
Regional Attorney

EXHIBIT 25