

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

**PROMPT MEDICAL TRANSPORTATION, INC.  
D/B/A PROMPT AMBULANCE SERVICE,  
PROMPT CENTRAL, INC., AND GSM GROUP**

**and**

**CASE 13-CA-202127**

**INTERNATIONAL ASSOCIATION OF EMTS AND  
PARAMEDICS (IAEP), SEIU LOCAL 5000**

**MOTION TO TRANSFER PROCEEDINGS TO THE  
BOARD AND MOTION FOR DEFAULT JUDGMENT**

Michael Schorsch, Counsel for the General Counsel of the National Labor Relations Board, files this Motion to Transfer Proceedings to the Board and Motion for Default Judgment, pursuant to Section 102.50 and 102.56 of the Board's Rules and Regulations. The General Counsel is entitled to default judgment in this matter because Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service, Prompt Central, Inc., and GSM Group (Respondent) has failed to comply with the requirements for filing an answer to complaint as prescribed by Section 102.20 and 102.21 of the Board's Rules and Regulations. *Windward Roofing and Construction Co., Inc.*, 333 NLRB 658 (2001); *U.S. Telefactors Corporation*, 293 NLRB 567 (1989).

In support of this motion, Counsel for the General Counsel states the following:

1. Pursuant to an unfair labor practice charge by the International Association of EMTs and Paramedics (IAEP), SEIU Local 5000 (the "Union") filed on July 10, 2017, the Acting Regional Director for Region 13 issued a Complaint and Notice of Hearing on August 18, 2017, alleging violations of Sections 8(a)(1) and (5) of the National Labor Relations Act. A copy of the charge, the affidavit of service for the

charge, the Complaint and Notice of Hearing, and the affidavit of service for the Complaint and Notice of Hearing are attached hereto as Exhibits 1 through 4, respectively.

2. The Complaint advised Respondent that pursuant to Section 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the Complaint by September 1, 2017. The Complaint further advised that if no answer was filed, or if an answer was filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the Complaint are true.

3. On October 18, 2017, Mr. Schorsch sent Respondent a letter via regular and electronic mail. The letter stated that Respondent had failed to file an answer to the Complaint by the specified deadline, and that if Respondent failed to file an answer by October 25, 2017, the Region would file a Motion for Default Judgment with the Board. A copy of the letter is attached hereto as Exhibit 5.

4. On October 24, 2017, Respondent replied to Mr. Schorsch's letter. Rather than filing an answer in compliance with the Board's Rules and Regulations stated above, Respondent's letter attempted to argue that the charge lacked merit. A copy of the letter is attached hereto as Exhibit 6.

5. Respondent has thus far failed to specifically admit, deny, or explain each of the facts alleged in the complaint or whether Respondent was without knowledge, as required by Section 102.20. By its October 24, 2017 letter, Respondent has simply attempted to argue that the charge has no merit by stating facts not yet in evidence.

6. Respondent's letter of October 24, 2017 also fails by form. The Complaint advised Respondent "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.” See Exhibit 3. Respondent’s letter was not a pdf file. Respondent’s letter was only electronically filed and electronically mailed to Mr. Schorsch and Field Examiner Christina Mols.

7. Respondent further failed to comply with Section 102.21 concerning service of the answer on other parties. Specifically, Respondent did not serve a copy of its October 24, 2017, letter on the Union.

8. Due to the lack of a proper answer to the complaint no hearing in this matter is necessary and the Board should issue a Decision and Order without further proceedings herein.

WHEREFORE, Counsel for the General Counsel respectfully moves that the Board grant the Motion to Transfer Proceedings to the Board and Motion for Default Judgment, finding all of the allegations of the Complaint to be true, and issue an appropriate Decision and Order.

DATED at Chicago, Illinois, this 7<sup>th</sup> day of November 2017.

/s/ Michael Schorsch  
Michael Schorsch  
Counsel for the General Counsel  
National Labor Relations Board  
Region 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

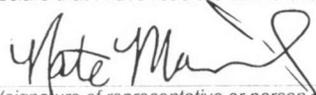
Attachments

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

DO NOT WRITE IN THIS SPACE	
Case 13-CA-202127	Date Filed 7/10/17

**INSTRUCTIONS:**

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

<b>1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT</b>	
a. Name of Employer Prompt Medical Transportation, Inc. d/b/a/ Prompt Ambulance Service, Prompt Central, Inc. and GSM Group	
b. Tel. No. 2199341010	
c. Cell No. 2197125420	
f. Fax No. 2199243192	
g. e-Mail garymiller@promptambulance.com	
h. Number of workers employed	
d. Address (Street, city, state, and ZIP code) 9835 Express Drive Highland Indiana 46322	e. Employer Representative Gary Miller
i. Type of Establishment (factory, mine, wholesaler, etc.) Ambulance Service	j. Identify principal product or service Emergent/Non Emergent transport of patients
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 (list subsections) 8(a)(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)	
Within the past 6 months, above employer has refused to provide to the union pertinent information requested, as needed to carry out its duty to represent the employees of said employer.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number)	
International Association of EMT's and Paramedics (IAEP), SEIU Local 5000	
4a. Address (Street and number, city, state, and ZIP code) 159 Burgin Parkway Quincy MA 02169	
4b. Tel. No. 6173760220	
4c. Cell No. 8104410068	
4d. Fax No. 6173760285	
4e. e-Mail nmorrish@nage.org	
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) Service Employees International Union (SEIU)	
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.	
By  Nate Morrish, National Representative	
(signature of representative or person making charge) (Print/type name and title or office, if any)	
Tel. No. 810-441-0068	
Office, if any, Cell No.	
Fax No. 617-376-0285	
e-Mail nmorrish@nage.org	
Address PO Box 233, Holly MI 48442	
07/10/2017 (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 for processing unfair labor practice and related proceedings or litigation. The routine uses for the information are: (1) to provide information to the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are: (2) to provide information to the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of the information is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.



UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**PROMPT MEDICAL TRANSPORTATION, INC.  
D/B/A PROMPT AMBULANCE SERVICE,  
PROMPT CENTRAL, INC., AND GSM GROUP**

Charged Party

and

**INTERNATIONAL ASSOCIATION OF EMTS  
AND PARAMEDICS (IAEP), SEIU LOCAL 5000**

Charging Party

Case 13-CA-202127

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on July 11, 2017, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

Gary Miller  
Prompt Medical Transportation, Inc. d/b/a  
Prompt Ambulance Service, Prompt  
Ambulance Central, Inc., and GSM Group  
9835 Express Drive  
Highland, IN 46322

July 11, 2017

\_\_\_\_\_  
Date

Denise Gatsoudis, Designated Agent of  
NLRB

\_\_\_\_\_  
Name

*/s/ Denise Gatsoudis*

\_\_\_\_\_  
Signature

**EXHIBIT**

tabbles

*2*

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

**PROMPT MEDICAL TRANSPORTATION, INC.  
D/B/A PROMPT AMBULANCE SERVICE,  
PROMPT CENTRAL, INC., AND GSM GROUP**

**and**

**Case 13-CA-202127**

**INTERNATIONAL ASSOCIATION OF EMTS  
AND PARAMEDICS (IAEP), SEIU LOCAL 5000**

**COMPLAINT AND NOTICE OF HEARING**

This Complaint and Notice of Hearing is based on a charge filed by International Association of EMTs and Paramedics (IAEP), SEIU Local 5000 (Charging Party). 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 Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service, Prompt Ambulance Central, Inc., and GSM Group (Respondent) has violated the Act as described below.

**I**

The charge in this proceeding was filed by the Charging Party on July 10, 2017, and a copy was served on Respondent by U.S. mail on July, 11, 2017.

**II**

- (a) At all material times, Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service, an Indiana corporation with a principal place of business in Highland, Indiana, has been an ambulance service providing emergency medical response services and medical transportation.
- (b) At all material times, Prompt Ambulance Central, Inc., an Indiana corporation with a principal place of business in Highland, Indiana, has been an ambulance service providing emergency medical response services and medical transportation.
- (c) At all material times, GSM Group, LLC, an Indiana limited liability corporation with a principal place of business in Highland, Indiana, has been engaged in the business of owning and leasing ambulance stations and other real property.
- (d) At all material times, Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service, Prompt Ambulance Central, Inc., and GSM Group, LLC:



- (i) have been affiliated business enterprises under common control;
- (ii) have shared common officers, directors, management, or supervision;
- (iii) have been under common ownership;
- (iv) have formulated and administered a common labor policy;
- (v) have shared common premises and facilities;
- (vi) have performed services for each other;
- (vii) have made sales or assignments to each other;
- (viii) have held themselves out to those with whom they have business dealings as a single, integrated enterprise.

(e) Based on its operations described above in paragraphs II(a-d), Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service, Prompt Ambulance Central, Inc., and GSM Group, LLC constitute a single integrated business enterprise and a single employer within the meaning of the Act.

(f) During the past calendar year, a representative period, in conducting its business operations described in paragraphs II(a-c), Respondent Prompt derived gross revenues in excess of \$250,000.

(g) During the time period described above in paragraph II(f), Respondent Prompt purchased and received goods and services valued in excess of \$5,000 at its facility in Highland, Indiana directly from points outside the State of Indiana.

(h) At all material times, Respondent Prompt has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act, and has been a health care institution within the meaning of Section 2(14) of the Act.

### III

At all material times, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

### IV

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

(a) Gary Miller	<ul style="list-style-type: none"> <li>i. CEO, Vice President, and 50% owner of Prompt Ambulance Service.</li> <li>ii. President and 50% owner of Prompt Ambulance Central.</li> <li>iii. Member and 50% owner of GSM Group, LLC.</li> </ul>
(b) Shar Miller	<ul style="list-style-type: none"> <li>i. President and 50% owner of Prompt Ambulance</li> </ul>

	Service.
	ii. Vice President and 50% owner of Prompt Ambulance Central.
	iii. Member and 50% owner of GSM Group, LLC.
(c) Joseph Merry	Director of Operations, Prompt Ambulance Service.

## V

(a) The following employees of Respondent Prompt 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 Ambulance Drivers, Paramedics and Emergency Medical Technicians (EMT's) employed by the Employer, working in and out of the employer's stations and deployment centers in Northwest Indiana currently located at: 2716 Condit Street, Highland IN; 8006 Tyler Street, Merrillville, IN; 216 Schulte Street, Dyer, IN; 4849 Kennedy Ave, East Chicago, IN; 6300 Broadway, Merrillville, IN; 9835 Express Drive, Highland, IN; 2301 East Columbus Drive, East Chicago, IN; 9430 Calumet Ave, Munster, IN; and 242 N. Griffith, Griffith, IN.

(b) On May 20, 2016, the Board certified the Charging Party as the exclusive collective-bargaining representative of the Unit.

(c) At all times since May 20, 2016, based on Section 9(a) of the Act, the Union has been the exclusive collective-bargaining representative of the Unit.

## VI

(a) Since about June 28, 2017, the Union has requested orally and in writing that Respondent furnish the Union with the following information: "An audited and certified true copy of any and all financial statements as it pertains to Collective Bargaining Unit members employed by Prompt Medical Transportation, Inc. d/b/a Prompt Ambulance Service."

(b) The information requested by the Union, as described above in paragraph VI(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 June 28, 2017, Respondent, by Gary Miller, orally and in writing, has failed and refused to furnish the Union with the information requested by it as described above in paragraph VI(a).

## VII

By the conduct described above in paragraph VI, 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

## VIII

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

### 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 complaint. The answer must be **received by this office on or before September 1, 2017, or postmarked on or before August 31, 2017.**

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](http://www.nlr.gov), click on **E-File 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 complaint are true.

### NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on December 18, 2017 at 11:00 a.m. at 219 South Dearborn Street, Suite 808, Chicago, Illinois 60604, 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 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: August 18, 2017

*/s/ Paul Hitterman*

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Paul Hitterman  
Acting Regional Director  
National Labor Relations Board  
Region 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Attachments

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case 13-CA-202127

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements **will not be granted** unless good and sufficient grounds are shown **and** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in **detail**;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Gary Miller  
Prompt Medical Transportation, Inc. d/b/a  
Prompt Ambulance Service, Prompt  
Ambulance Central, Inc., and GSM Group  
9835 Express Drive  
Highland, IN 46322

Nate Morrish, National Representative  
International Association of EMT's and  
Paramedics  
P.O. Box 233  
Holly, MI 48442

International Association of EMTs and  
Paramedics (IAEP), SEIU Local 5000  
159 Burgin Parkway  
Quincy, MA 02169

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13

PROMPT MEDICAL TRANSPORTATION, INC.  
D/B/A PROMPT AMBULANCE SERVICE,  
PROMPT CENTRAL, INC., AND GSM GROUP

and

Case 13-CA-202127

INTERNATIONAL ASSOCIATION OF EMTS  
AND PARAMEDICS (IAEP), SEIU LOCAL 5000

**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 August 18, 2017, 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:

Mr. Gary Miller  
Prompt Medical Transportation, Inc. d/b/a  
Prompt Ambulance Service, Prompt  
Ambulance Central, Inc., and GSM Group  
9835 Express Drive  
Highland, IN 46322

**CERTIFIED MAIL, RETURN RECEIPT  
REQUESTED**

Nate Morrish, National Representative  
International Association of EMT's and  
Paramedics  
P.O. Box 233  
Holly, MI 48442

**FIRST CLASS MAIL**

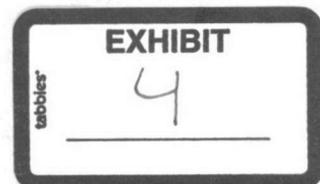
International Association of EMTs and  
Paramedics (IAEP), SEIU Local 5000  
159 Burgin Parkway  
Quincy, MA 02169

**CERTIFIED MAIL**

August 18, 2017  
\_\_\_\_\_  
Date

Denise Gatsoudis, Designated Agent of NLRB  
\_\_\_\_\_  
Name

/s/ Denise Gatsoudis  
\_\_\_\_\_  
Signature





UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341

October 18, 2017

VIA EMAIL AND REGULAR MAIL

Mr. Gary Miller  
Prompt Ambulance Service  
9835 Express Dr.  
Highland, IN 46322

Re: Prompt Medical Transportation, Inc. et al.  
Case 13-CA-202127

Dear Mr. Miller:

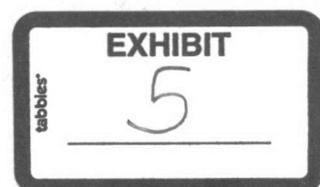
A Complaint and Notice of Hearing issued in the above-captioned case on August 18, 2017, and a copy of that Complaint and Notice of Hearing has been attached hereto. Pursuant to Section 102.20 of the Board's Rules and Regulations, you were required to file an Answer to the Complaint and Notice of Hearing no later than September 1, 2017. As of this date, the Regional Office has not received your Answer. Accordingly, please be advised that a Motion for Default Judgment will be filed with the Board if an Answer is not received in the Regional Office by the close of business on Wednesday, October 25, 2017. If you have any questions, please call me at (312) 353-9778.

Sincerely,

/s/ *Michael Schorsch*

Michael Schorsch  
Board Agent

Enclosure: Complaint and Notice of Hearing



October 24, 2017

Mr. Michael Schorsch  
Attorney  
National Labor Relations Board- Region 13  
Dirksen Federal Building  
219 South Dearborn St. Suite 808  
Chicago, IL 60604-2027

**Via Electronic Filing and Email to [Christina.mols@nlrb.gov](mailto:Christina.mols@nlrb.gov)**

**Re: Prompt Medical Transportation d/b/a Prompt Ambulance Service, Prompt Central, Inc. and GSM Group, Case No. 13-CA-202127**

Dear Mr. Schorsch:

This letter constitutes the response of Prompt Medical Transportation d/b/a Prompt Ambulance Service, Inc. ("the Company" or "Prompt") to the allegations in the above-referenced Charge filed by the International Association of EMTs and Paramedics, SEIU Local 5000 ("the Union") and to the request for evidence contained in your October 18, 2017 letter.

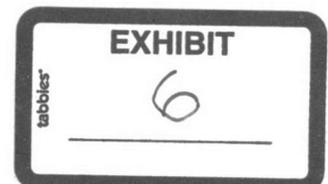
The Company denies that it has violated the National Labor Relations Act ("NLRA" or "the Act")

I. ARGUMENT

During a recent impact bargaining session on August 9, 2017, there was a discussion between the mediators and management for Prompt for releasing financial statements. It was agreed a mutually agreeable statement would be drafted and the union would have access to financial statements.

The union was presented with such a statement on September 21<sup>st</sup>, 2017.

The next scheduled bargaining session was October 3, 2017. At that meeting the union said they agreed to not look at financial statements as long as we had a severance package to present. We had never indicated to the mediators or the union that such a severance



package was possible. The union left after only being on site less than two hours. There was no mention from them or the mediators on proceeding with going over financial statements.

## II. CONCLUSION

Prompt has not failed to bargain with the Union. There is no substance or merit to the allegations of the Charge.

If you require any other information regarding Prompt's position in this matter, please let me know. We will offer our full cooperation to the Board to help you resolve this matter as expeditiously as possible.

We would like the opportunity to discuss any questions you might still have regarding this matter. We can be reached at the number that appears below.

Sincerely,

Gary T. Miller

**CERTIFICATE OF SERVICE**

This is to certify that on November 7, 2017, copies of the attached Motion to Transfer Proceedings to the Board and Motion for Default Judgment have been served upon the following in the manner indicated:

**ELECTRONICALLY MAILED:**

Gary Miller  
Prompt Medical Transportation, Inc. d/b/a  
Prompt Ambulance Service, Prompt Ambulance Central, Inc.,  
and GSM Group  
9835 Express Drive  
Highland, IN 46322  
garymiller@promptambulance.com

Nate Morrish, National Representative  
International Association of EMT's and Paramedics  
P.O. Box 233  
Holly, MI 48442  
nmorrish@nage.org

**VIA REGULAR MAIL:**

International Association of EMTs and Paramedics (IAEP),  
SEIU Local 5000  
159 Burgin Parkway  
Quincy, MA 02169

/s/ Michael Schorsch \_\_\_\_\_  
Michael Schorsch  
Counsel for the General Counsel  
National Labor Relations Board  
Region 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027