

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 27**

MORNINGSTAR SENIOR MANAGEMENT LLC

Employer

and

Case 27-RC-262531

**SERVICE EMPLOYEES INTERNATIONAL UNION
LOCAL 105**

Petitioner

DECISION AND DIRECTION OF ELECTION

On July 1, 2020¹ Service Employees International Union Local 105 (Petitioner) filed the instant representation petition under Section 9(c) of the National Labor Relations Act, as amended (Act), seeking to represent a unit of employees employed by MorningStar Senior Management LLC (Employer) at its Boulder, Colorado facility (Employer's facility). There are approximately 60 employees in the unit sought.

A videoconference hearing was held on July 23 before a hearing officer of the National Labor Relations Board (Board). The only matter at issue is whether the election should be conducted by manual or mail ballot method. Election arrangements, including the voting method, are not litigable matters at a pre-election hearing, but the positions of the parties were solicited for consideration prior to the direction of an election. Petitioner maintains a mail ballot election is the appropriate choice under the circumstances present, while the Employer argues that a manual election can be conducted safely and is the correct choice.

The Board has delegated its authority in this proceeding to me under Section 3(b) of the Act. Having considered the entire record in this proceeding, relevant Board law, and the arguments of the parties I find the combination of the current pandemic and the circumstances surrounding the Employer's facility creates an extraordinary circumstance making a mail-ballot election appropriate in this case.

BACKGROUND

At this point in the pandemic, while many aspects of COVID-19 remain not fully understood, the critical public health interventions for reducing the spread of the virus are well-established. The Centers for Disease Control and Prevention (CDC) emphasizes that "[t]he best way to prevent illness is to avoid being exposed to the virus," as there is currently no approved vaccine or antiviral treatment, and "[m]inimizing person-to-person transmission of SARS-CoV-2 is critical to reducing the impact of COVID-19." *How to Protect Yourself &*

¹ All dates 2020 unless otherwise noted.

*Others.*² As a practical matter this has resulted in many Federal, state, and local government guidelines focusing on the same set of practices to avoid respiratory person-to-person transmission: avoid social gatherings, avoid discretionary travel, practice good hygiene, maintain at least a 6-foot distance between individuals, and use cloth face coverings when around other people. The CDC has also highlighted the risk posed by pre-symptomatic and asymptomatic transmission, stating “transmission in the absence of symptoms reinforces the value of measures that prevent the spread of [COVID-19] by infected persons who may not exhibit illness despite being infectious.” *Evidence Supporting Transmission of Severe Acute Respiratory Syndrome Coronavirus 2 While Presymptomatic or Asymptomatic.*³ Despite efforts to limit transmission, as of July 28, over 4.2 million people in the United States have been infected with COVID-19 and over 147,000 people have died.⁴

Although it has not directly addressed Board elections, the CDC has issued guidance on elections in general. Its *Considerations for Election Polling Locations and Voters* states officials should “consider offering alternatives to in-person voting if allowed” and that “[v]oting alternatives that limit the number of people you come in contact with or the amount of time you are in contact with others can help reduce the spread of COVID-19.”⁵ The CDC acknowledges the virus can survive for a short period on some surfaces, and that it is possible to contract COVID-19 by touching a surface or object that has the virus on it and then touching one’s mouth, nose, or eyes, but adds due to the nature of the virus “it is unlikely to be spread from domestic or international mail, products or packaging.” *Am I at risk for COVID-19 from mail, packages, or products?*⁶ To avoid the unlikely possibility of contracting COVID-19 through the mail, the CDC simply advises: “After collecting mail from a post office or home mailbox, wash your hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol.” *Running Essential Errands.*⁷

Residential nursing facilities are particularly vulnerable to COVID-19 outbreaks because of the shared living spaces and at-risk population.⁸ On March 12, one of the early public health orders issued in Colorado, *Public Health Order 20-20 Restricting Visitors at All Colorado Skilled Nursing Facilities, Assisted Living Residences, and Intermediate Care facilities*, specifically addressed the need to restrict visitors to nursing facilities in order to prevent COVID-19 outbreaks. The importance of this limitation has been repeated as the pandemic continues. The most recent comprehensive Public Health Order in Colorado, *Eighth Amended Public Health Order 20-28, Safer at Home and in the Vast, Great Outdoors*, also includes this restriction.⁹ The guidance document for Complying with Order 20-28, specifically addresses “Nursing Homes & Congregate Care Facilities,” and requires

² See <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>

³ See https://wwwnc.cdc.gov/eid/article/26/7/20-1595_article

⁴ See <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>.

⁵ <https://www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html>

⁶ See <https://www.cdc.gov/coronavirus/2019-ncov/faq.html>

⁷ See <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/essential-goods-services.html>

⁸ The CDC website states urges that polling locations be relocated “from nursing homes, long-term care facilities, and senior living residences, to help protect older adults and those with underlying medical conditions from potential COVID-19 exposure.” <https://www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html>

⁹ <https://drive.google.com/file/d/1SGpUbcOFi6W0qdkXntKtSW9pitGoBF6H/view?usp=sharing>

that facilities must “restrict visitation of non-essential individuals.”¹⁰ The CDC has also addressed the importance of limiting visitors in long-term care facilities. The first recommendation it makes regarding preventing COVID-19 outbreaks at older adult living facilities is to “restrict visitors.”¹¹

The guidance document for Public Health Order 20-28 also notes that these facilities, in addition to limiting visitors, must also have an isolation plan, frequently disinfect high-touch areas, and install touchless hand sanitizing stations. The guidelines further require that employees, contractors, and essential individuals entering the facility must complete health screening, and after screening limit movement to the resident’s room, limit surfaces touched, and use personal protective equipment (a gown, gloves, and a mask), throughout their time at the facility.

Boulder is located approximately 30 miles northwest of Denver, Colorado, where the Regional Office is located. To date, Boulder County has had approximately 1,982 confirmed cases of COVID-19, although testing delays have been an issue throughout Colorado and the number may be higher.¹² The situation in Boulder is sufficiently serious that the Boulder Valley School District announced that it is beginning the school year on August 26 with only at-home learning to limit the spread of COVID-19. Some neighboring counties with similar population sizes, such as Weld County to the east and Jefferson County to the south, have had outbreaks that have resulted in almost twice that many positive cases: approximately 3,617 and 4051 respectively. Other counties with larger populations in the area, such as Denver County, including the city of Denver, and El Paso County, including the city of Colorado Springs, have also had large outbreaks, with 9,968 and 4,754 cases respectively.

POSITIONS OF THE PARTIES

Petitioner maintains the current pandemic makes a mail ballot election the only appropriate way to conduct the petitioned-for election. Petitioner asserts that COVID-19 and the associated risks create an extraordinary circumstance that requires deviation from the Board’s usual practice of manual elections. Specific to this case, Petitioner notes that Boulder County has moderately high cumulative incidence rate in the two weeks prior to the hearing, and while employees work in Boulder County, they may live in El Paso County and other counties much more impacted by the pandemic. In addition to the risk posed to employees in a manual election, Petitioner also notes the risk congregating for a manual election poses to residents, as the vast majority of fatalities caused by COVID-19 have been in patients age 75 or older. Petitioner maintains that a manual election would bring employees together and create an unnecessary risk, both to themselves and the vulnerable residents.

The Employer contends that a safe election can be held at its facility because it is not open to the public and precisely because it has extensive protocols in place to prevent the spread of COVID-19 among its vulnerable population of residents. The Employer notes that it regularly tests residents and employees, and as of the date of the hearing no resident or employee has tested positive for COVID-19. The Employer contends that its face

¹⁰ <https://drive.google.com/file/d/1rLNy2vAgVvebgqfwBpJGIPph6lzIPBrM/view>

¹¹ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/older-adults.html>

¹² <https://covid19.colorado.gov/data/case-data>

covering, social distancing, and screening protocols (compliant with the Colorado requirements described above), will protect participants in a manual election from transmission.

The Petitioner disputes many of the Employer's contentions concerning strict adherence to protocols. It argues that testing is voluntary and only recently introduced, and as such does not provide an indication of a COVID-19 free environment. Further, Petitioner maintains the Employer does not provide test results to employees. The Employer denies many of Petitioner's assertions, but acknowledges that testing is voluntary.

The Employer proposes holding the election in the facility's library, which has a single interior and single exterior door, allowing for limited ingress and egress. Although the Employer did not provide specific details at the hearing regarding the library such as its size, it maintains it would be sufficiently large to allow six feet of distance between the Board Agent, observers, and ballot box. The Employer adds that the library is not currently in use as it was used for resident group activities and those have been cancelled since the beginning of the pandemic. The Employer maintains the library would be thoroughly cleaned before the election, and that it would mark a socially distanced waiting line outside the library. The Employer also indicated it would otherwise comply with the recommendations of the General Counsel of the Board (General Counsel) regarding manual elections, discussed in the following section.

The Employer proposes a 7-hour polling session between the hours of 10 a.m. and 5:00 p.m. on a Thursday, the time period when employees are offered COVID-19 testing each week. The Employer maintains that almost all employees come to the facility to be tested, so the election would not result in any additional visitation. When questioned regarding whether the employees at issue are working at other residential care facilities, the Employer indicated that has been prohibited since the beginning of the pandemic. As with other contentions by the Employer, Petitioner disputes these positions and argues to the contrary. Petitioner also contends that the library is not a restricted area and is in regular use by employees and others, even if it is no longer used for resident group activities. Additionally, Petitioner maintains the library is where testing has been conducted each Thursday. Petitioner also entered a photo of the library in the record, arguing it is too small to allow the necessary social distancing.

BOARD'S STANDARD

Congress has entrusted the Board with a wide degree of discretion in establishing the procedure and safeguards necessary to insure the fair and free choice of bargaining representatives, and the Board in turn has delegated the discretion to determine the arrangements for an election to Regional Directors. *San Diego Gas and Elec.*, 325 NLRB 1143, 1144 (1998); citing *Halliburton Services*, 265 NLRB 1154 (1982); *National Van Lines*, 120 NLRB 1343, 1346 (1958); *NLRB v. A.J. Tower Co.*, 329 U.S. 324, 330 (1946). This discretion includes the ability to direct a mail ballot election where appropriate. *San Diego Gas & Elec.* at 1144-1145. Whatever decision a Regional Director does make should not be overturned unless a clear abuse of discretion is shown. *National Van Lines* at 1346.

The Board's longstanding policy is that elections should, as a rule, be conducted manually. *National Labor Relations Board Casehandling Manual Part Two Representation Proceedings*, Sec. 11301.2. However, a Regional Director may reasonably conclude, based

on circumstances tending to make voting in a manual election difficult, to conduct an election by mail ballot. *Id.* This includes a few specific situations addressed by the Board, including where voters are “scattered” over a wide geographic area, “scattered” in time due to employee schedules, in strike situations, or other extraordinary circumstances. *San Diego Gas*, *supra* at 1145.

On May 8, the Board, in an Order denying a request for review in *Atlas Pacific Engineering Company*, Case 27-RC-258742, addressed a mail ballot determination in the context of the COVID-19 pandemic. In its footnote to that Order, the Board noted that *San Diego Gas* contemplated “extraordinary circumstances” beyond the considerations described above, and that circumstances in place at the time – federal, state, and local government directives limiting nonessential travel, requiring the closure of nonessential businesses, and the Regional office conducting the election on mandatory telework – constituted a valid basis for directing a mail ballot election in that case after considering the conditions surrounding a manual election.

On July 6, the General Counsel issued a memorandum titled “Suggested Manual Election Protocols.” *Memorandum GC 20-10*. In that memo the General Counsel reiterated that Regional Directors have the authority, delegated by the Board, to make “initial decisions about when, how, and in what manner all elections are conducted.” The General Counsel further noted Regional Directors have, and will:

make these decisions on a case-by-case basis, considering numerous variables, including, but not limited to, the safety of Board Agents and participants when conducting the election, the size of the proposed bargaining unit, the location of the election, the staff required to operate the election, and the status of pandemic outbreak in the election locality.

The memorandum then addressed suggested election mechanics, certifications and notifications required to verify a safe election can occur, and the need to include election arrangements in an election agreement.

DETERMINATION

The instant case raises the issue of whether to direct a mail ballot election based on public health concerns, and specifically whether the circumstances of the COVID-19 pandemic, in Boulder and the Employer’s facility, make a mail ballot appropriate. Before turning to the specifics of this case, I note that I am only considering a mail ballot election in this matter because of the extraordinary circumstances presented by the COVID-19 pandemic.

It is apparent that the parties disagree regarding many, if not all, of the circumstances surrounding this election as it relates to COVID-19. Both have made assertions that are impossible to ascertain. I also find, for the reasons discussed below, that the information in the record does not make it possible to craft an alternative manual polling period that could safely provide a sufficient opportunity for employee to vote in a manual election. The employee list submitted as part of the Employer’s Statement of Position, shows that there are employees assigned to day, evening, night, and “mixed” shifts. The list also shows that there are approximately 18 part-time employees, which is a significant portion of the unit. Accordingly, I have made my decision based on what can be determined.

First, the best way to prevent illness is to avoid being exposed to the virus by person-to-person contact. Any manual election requires a certain amount of congregating, including the parties' representatives, observers, and Board agent at the pre-election conference; the Board Agent, observers, and voters in the polling place during the election; and employees waiting in line to vote. Steps can be taken to mitigate the risk posed by this gathering, such as the use of face coverings and marking six-foot distances on the floor, but these measures merely reduce the danger of transmission, they do not eliminate it. The Employer proposes a 7-hour polling period, in part to spread out voters and prevent congregating, but if that proposal were adopted the observers will spend a significant amount of time in a room with each other, the Board agent, and a progression of voters who may arrive at separate times or grouped together, depending on when they would choose to arrive. This is a problem that cannot be easily solved in a manual election; a shorter polling period (or periods) limits the amount of time the Board agent and observers congregate in a confined indoor space, but it increases the likelihood of voters congregating while waiting to vote. Shorter polling periods also increase the likelihood that unscheduled employees may not have a sufficient opportunity to vote. As noted, a longer polling period simply reverses the situation. In the end, regardless of disputed facts such as the specific dimensions of the library and its use during the pandemic, I find the Employer's proposed 7-hour polling period will keep the Board agent and observers confined to a relatively small room with a progression of voters over a long period of time.

Second, while person-to-person transmission is a significant risk, the virus is unlikely to be spread by domestic mail. I am sensitive to the Employer's argument that the Board has a longstanding preference for manual elections, and that mail ballot elections have traditionally resulted in lower voter turnout. This is the reason why a mail ballot is only ordered under extraordinary circumstances and, as noted, absent the pandemic I would not be considering a mail ballot election.

Third, and finally, is the most important consideration in making my decision: the nature of the Employer's facility and the repeated direction by Federal and state authorities to restrict non-essential visitors to residential care facilities. Both the CDC and Colorado guidelines make it abundantly clear that, due to the vulnerable nature of the residents, it is critically important that outside visitors are kept to a minimum. Clearly, some visitors are essential, such as resident's physicians, but I am not inclined to find that sending a Board agent to the facility to spend a significant time with the observers in a room is essential when an alternative to in-person voting exists. While the Employer may endeavor to be extremely diligent in preventing the spread of COVID-19, sending a visitor to a facility where guidelines at all levels indicate the most important preventative measure is avoiding non-essential visitors does not appear to be appropriate under the current circumstances.

I find these factors, including the nature of the Employer's operations, the current status of the COVID-19 pandemic in Boulder and surrounding counties, the time that observers would have to spend inside this facility with a Board agent, and the number of voters passing through, create an extraordinary circumstance. For these reasons, I am directing a mail ballot election in this matter.

CONCLUSIONS

Under Section 3(b) of the Act, I have the authority to hear and decide this matter on behalf of the National Labor Relations Board. Upon the entire record in this proceeding, I find:

1. The hearing officer's rulings made at the hearing are free from prejudicial error and are affirmed.

2. The Employer is engaged in commerce within the meaning of the Act, and it will effectuate the purposes of the Act to assert jurisdiction herein.¹³

3. The labor organization involved claims to represent certain employees of the Employer.

4. A question affecting commerce exists concerning the representation of certain employees of the Employer within the meaning of Section 9(c)(1) and Section 2(6) and (7) of the Act.

5. The following employees of the Employer constitute a unit appropriate for the purpose of collective bargaining within the meaning of Section 9(b) of the Act:

Included: All full-time and regular part-time employees of the Employer at its facility located in Boulder, Colorado.

Excluded: All clerical employees, confidential employees, temporary employees, professional employees, managers, guards and supervisors as defined in the Act.

DIRECTION OF ELECTION

The National Labor Relations Board will conduct a secret ballot election among the employees in the unit found appropriate above. Employees will vote whether or not they wish to be represented for purposes of collective bargaining by **SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 105**.

¹³ During the hearing the parties stipulated to the following commerce facts:

The Employer, a Colorado limited liability company, is engaged in the management of senior living communities, including the facility involved herein, located in Boulder, Colorado. Within the past 12 months, a representative time period, the Employer, in conducting its operations at its Boulder, Colorado assisted living facility derived gross revenues in excess of \$100,000, and purchased and received goods and services for use at its facility in excess of \$5,000 directly from points outside the State of Colorado.

A. Election Details

I have determined that a mail ballot election will be held.

The ballots will be mailed to employees employed in the appropriate collective-bargaining unit. At **3:00 p.m. on Monday, August 17, 2020**, ballots will be mailed by an agent of Region 27 of the National Labor Relations Board.¹⁴ Voters must sign the outside of the envelope in which the ballot is returned. Any ballot received in an envelope that is not signed will be automatically void.

Those employees who believe that they are eligible to vote and did not receive a ballot in the mail by **Monday, August 24, 2020**, should communicate immediately with the National Labor Relations Board by either calling the Region 27 Office at **(303) 844-3551** or our national toll-free line at **1-866-667- NLRB (1-866-667-6572)**.

Voters must return their mail ballots so that they will be received in the National Labor Relations Board, Region 27 office by **3:00 p.m. on Monday, September 14, 2020**. **All ballots will be commingled and counted by an agent of Region 27 of the National Labor Relations Board on Monday, September 14, 2020 at 3:00 p.m.**, by videoconference to be arranged by the Region. In order to be valid and counted, the returned ballots must be received at the Regional Office prior to the counting of the ballots. A meeting invitation for the videoconference will be sent to the parties' representatives prior to the count. No party may make a video or audio recording or save any image of the ballot count.

B. Voting Eligibility

Eligible to vote are those in the unit who were employed during the payroll period ending immediately prior to the date of this Decision, including employees who did not work during that period because they were ill, on vacation, or temporarily laid off.

Employees engaged in an economic strike, who have retained their status as strikers and who have not been permanently replaced, are also eligible to vote. In addition, in an economic strike that commenced less than 12 months before the election date, employees engaged in such strike who have retained their status as strikers but who have been permanently replaced, as well as their replacements, are eligible to vote. Unit employees in the military services of the United States may vote if they appear in person at the polls.

Ineligible to vote are (1) employees who have quit or been discharged for cause since the designated payroll period; (2) striking employees who have been discharged for cause since the strike began and who have not been rehired or reinstated before the election date; and (3) employees who are engaged in an economic strike that began more than 12 months before the election date and who have been permanently replaced.

¹⁴ The Petitioner has waived all but one day of the 10-day period to have the Voter List prior to the commencement of the election.

C. Voter List

As required by Section 102.67(l) of the Board's Rules and Regulations, the Employer must provide the Regional Director and parties named in this decision a list of the full names, work locations, shifts, job classifications, and contact information (including home addresses, available personal email addresses, and available home and personal cell telephone numbers) of all eligible voters.

To be timely filed and served, the list must be *received* by the regional director and the parties by, **Monday, August 10, 2020**. The list must be accompanied by a certificate of service showing service on all parties. **The region will no longer serve the voter list.**

Unless the Employer certifies that it does not possess the capacity to produce the list in the required form, the list must be provided in a table in a Microsoft Word file (.doc or docx) or a file that is compatible with Microsoft Word (.doc or docx). The first column of the list must begin with each employee's last name and the list must be alphabetized (overall or by department) by last name. Because the list will be used during the election, the font size of the list must be the equivalent of Times New Roman 10 or larger. That font does not need to be used but the font must be that size or larger. A sample, optional form for the list is provided on the NLRB website at www.nlr.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015.

When feasible, the list shall be filed electronically with the Region and served electronically on the other parties named in this decision. The list may be electronically filed with the Region by using the E-filing system on the Agency's website at www.nlr.gov. Once the website is accessed, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions.

Failure to comply with the above requirements will be grounds for setting aside the election whenever proper and timely objections are filed. However, the Employer may not object to the failure to file or serve the list within the specified time or in the proper format if it is responsible for the failure.

No party shall use the voter list for purposes other than the representation proceeding, Board proceedings arising from it, and related matters.

D. Posting of Notices of Election

Pursuant to Section 102.67(k) of the Board's Rules, the Employer must post copies of the Notice of Election in conspicuous places, including all places where notices to employees in the unit found appropriate are customarily posted. The English, Spanish and Nepalese-language Notices of Election will be sent by the Region separately. The Notices must be posted so all pages of the Notices are simultaneously visible. In addition, if the Employer customarily communicates electronically with some or all of the employees in the unit found appropriate, the Employer must also distribute the Notices of Election electronically to those employees. The Employer must post copies of the Notices at least 3 full working days prior to 12:01 a.m. of the day of the election and copies must remain posted until the end of the election. For purposes of posting, working day means an entire 24-hour period excluding Saturdays, Sundays, and holidays. However, a party shall be estopped from objecting to the

nonposting of notices if it is responsible for the nonposting, and likewise shall be estopped from objecting to the nondistribution of notices if it is responsible for the nondistribution.

Failure to follow the posting requirements set forth above will be grounds for setting aside the election if proper and timely objections are filed.

RIGHT TO REQUEST REVIEW

Pursuant to Section 102.67 of the Board's Rules and Regulations, a request for review may be filed with the Board at any time following the issuance of the Decision until 14 days after a final disposition of the proceeding by the Regional Director. Accordingly, a party is not precluded from filing a request for review of this decision after the election on the grounds that it did not file a request for review of this decision prior to the election. The request for review must conform to the requirement of Section 102.67 of the Board's Rules and Regulations. A request for review must be E-Filed through the Agency's website and may not be filed by facsimile. To E-File the request for review, go to www.nlr.gov, select E-File Documents, enter the NLRB Case Number and follow the detailed instructions.¹⁵ A party filing a request for review must serve a copy of the request on the other parties and file a copy with the Regional Director. A certificate of service must be filed with the Board together with the request for review.

Neither the filing of a request for review nor the Board's granting a request for review will stay the election in this matter unless specifically ordered by the Board. If a request for review of a pre-election decision and direction of election is filed within 10 business days after issuance of the decision and if the Board has not already ruled on the request and therefore the issue under review remains unresolved, all ballots will be impounded. Nonetheless,

¹⁵ On October 21, 2019, the General Counsel (GC) issued Memorandum GC 20-01, informing the public that Section 102.5(c) of the Board's Rules and Regulations mandates the use of the E-filing system for the submission of documents by parties in connection with the unfair labor practice or representation cases processed in Regional offices. The E-Filing requirement went into immediate effect on October 21, 2019, and the 90-day grace period that was put into place expired on January 21, 2020. If not E-Filed, the request for review should be addressed to the Executive Secretary, National Labor Relations Board, 1015 Half Street SE, Washington, DC 20570-0001, and must be accompanied by a statement explaining the circumstances concerning not having access to the Agency's E-Filing system or why filing electronically would impose an undue burden.

MorningStar Senior Management LLC
Case 27-RC-262531

parties retain the right to file a request for review at any subsequent time until 10 business days following final disposition of the proceeding, but without automatic impoundment of ballots.

Dated at Denver, Colorado on the 6th day of August, 2020.

/s/ Paula Sawyer

PAULA SAWYER
REGIONAL DIRECTOR,
NATIONAL LABOR RELATIONS BOARD
REGION 27
BYRON ROGERS FEDERAL OFFICE
BUILDING
1961 STOUT STREET, SUITE 13-103
DENVER, CO 80294