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IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of:

Maricopa Ambulance, LLC,
Applicant.

Matter No. 2015A-EMS-0190-DHS

**MARICOPA AMBULANCE'S
RESPONSE TO AMERICAN
MEDICAL RESPONSE OF
MARICOPA, LLC AND
RURAL/METRO INTERVENORS'
MOTION FOR REHEARING OR
REVIEW**

(The Honorable Diane Mihalsky)

Although AMR has availed itself of the opportunity to file a motion for rehearing or review, which is its right, a response is not required and is discretionary with the opposing party. ARS § 41-1092.09(A)(2); AAC R9-1-103(B). We respond only to make a few observations, not because we believe AMR's Motion for Rehearing or Review has any merit. Except for some aspersions cast toward Glenn Leland, AMR's motion is a rehashing of arguments previously made, repeatedly responded to, and already ruled on. AMR's motion should be denied.

1. The Decisions of the Director and the ALJ Were Legally and Factually Sound.

AMR bases its *Motion for Rehearing or Review*, (filed June 21, 2016) (“*Motion for Rehearing*”) on the contentions that the recommendation by the ALJ and the subsequent decision by the Director of ADHS are not supported by the evidence, are contrary to the law, and that there was newly discovered material evidence not available at the time of the original hearing. Nothing could be further than the truth.

First, with the exception of the “after the record was closed” aspersions directed at Glenn Leland, which we will get to later, AMR’s *Motion for Rehearing* is nothing more than a rehash of matters that AMR presented in excruciating detail at the hearing and again briefed in its *Responsive Closing Argument & Memorandum of Law and Facts* (filed on February 29, 2016), and its *Supplemental Response* (filed on April 7, 2016). Except for the Leland aspersions, there is nothing new; nothing that wasn’t presented to the ALJ and available to her to make her recommendation; and nothing that should cause the Director to alter her decision in any fashion.

Second, an ALJ is “an individual ... that conducts administrative hearings in a contested case or an appealable agency action and that makes decisions regarding the contested case or appealable agency action.” ARS § 41-1092(1). Among the standards to which an ALJ is required to follow are that (i) an ALJ “shall be faithful to the law and maintain professional competence in it;” (ii) an ALJ “shall perform [his or her] judicial duties without bias or prejudice;” and (iii) an ALJ “shall dispose of all administrative judicial matters promptly, efficiently and *fairly*.” *Code of Administrative Law Judge Ethics: Ethical Standard 2* (emphasis added) Maricopa Ambulance presumes that the ALJ did her job consistent with her professional and ethical obligations. Again, except for the Leland aspersions, the ALJ had in front of her all

of the information rehashed in AMR's *Motion for Rehearing*, and her April 18, 2016 recommendation was meticulously based on that evidence, and was prompt, efficient, and fair.

Third, under ARS § 41-1092.08(B) and AAC R9-1-103(A), the Director had 30 days to “review the [ALJ’s] decision and accept, reject or modify it.” On May 18, 2016, after taking the full 30 days allowed, the Director concluded that the ALJ’s recommended decision was “supported by the greater weight of credible evidence, [was] consistent with applicable law, and [was] legally correct.” The Director therefore adopted the ALJ’s decision with certain amendments. Again, Maricopa Ambulance presumes that, after a diligent review, the Director performed her job in good faith and consistent with her professional and ethical obligations. Nothing in AMR’s *Motion for Rehearing* alters in any fashion the landscape that the Director has already navigated.

2. Except for the Leland Aspersions, AMR Says Nothing New.

Except for the Leland aspersions, there is nothing in AMR’s *Motion for Rehearing* that was not exhaustively raised and vetted in the hearing, and fully briefed and responded to in the post-hearing briefing. AMR’s arguments regarding the FirstMed bankruptcy are not new. These issues took hours of hearing time and then they were fully briefed. *See e.g. Maricopa Ambulance’s Written Closing Argument* (filed February 8, 2016), at pp. 50-53; *[AMR’s] Responsive Closing Argument and Memorandum of Law* (filed February 29, 2016), at 5-16; *Maricopa Ambulance’s Reply in Support of Its Written Closing Argument* (filed March 28, 2016), at pp. 32-41. AMR’s arguments are a rehash of its witness examinations during the hearing, and its post-hearing briefing. These arguments have already been fully vetted and ruled on.

Likewise, AMR's arguments regarding the ARCR process and Maricopa Ambulance's familiarity with Arizona's regulatory requirements were raised at the hearing, briefed, responded to, and ruled on. *See, e.g., Maricopa Ambulance's Written Closing Argument* (filed February 8, 2016), at pp. 50-52; *[AMR's] Responsive Closing Argument and Memorandum of Law* (filed February 29, 2016), at 17-34; *Maricopa Ambulance's Reply in Support of Its Written Closing Argument* (filed March 28, 2016), at pp. 29-32.

Regarding the Bankruptcy Trustee's response to motion to dismiss, AMR already presented that document to the ALJ through a supplemental filing. *See Supplemental Response of [AMR] Re: Closing Argument and Memorandum of Law and Facts* (filed April 7, 2016). AMR's *Motion for Rehearing* just takes one more opportunity to repeat what has already been raised, responded to, and ruled on. *See, e.g., Maricopa Ambulance's Reply in Support of Its Written Closing Argument* (filed March 28, 2016), at pp. 32-35. During the hearing, moreover, both Bryan Gibson and Samarth Chandra gave detailed accounts of the bankruptcy at FirstMed, as well as the facts behind the Trustee's allegations. That they were not recalled as witnesses after AMR introduced a copy of the Trustee's complaint into evidence is irrelevant. They had already been subject to days of cross examination by AMR – as well as Rural Metro, ABC Ambulance, and the Bureau – on this and other issues. Again, this issue has been raised, responded to, and ruled on. There is nothing new in AMR's *Motion for Rehearing* except for the aspersions directed toward Glenn Leland.

3. AMR Knew or Should Have Known that Glenn Leland was Hired by Priority on March 3, 2016. Not Only are AMR's Aspersions Immaterial, They Should Not Even Be Considered.

Regarding Mr. Leland, we note the following. Initially, the record in this case closed on March 28, 2016. *See Case Management Order No. 24* (filed January 14, 2016). AAC R2-19-

116 (H) provides that “unless otherwise provided by the administrative law judge, the hearing is concluded upon the submission of all evidence, the making of final argument, or the submission of all post-hearing memoranda, whichever occurs last.” AMR’s *Supplemental Response* – which attached the Bankruptcy Trustee’s written opposition to the motion to dismiss filed by Bryan Gibson and other defendants –was filed on April 7, 2016. Presumably, therefore, the record closed no later than April 7, 2016. As we have noted, the bankruptcy issues raised here again by AMR were raised, *ad nauseum*, in the hearing and in the post-hearing briefing, were responded to, and were ruled on. These are not “new” issues or evidence. They are just one more bite at the apple.

Mr. Leland, on the other hand, was hired by Priority Ambulance on March 3, 2016 – more than a month before AMR filed its *Supplemental Response*. Priority announced the hiring publicly on March 3. See <http://www.emsworld.com/news/12177885/priority-ambulance-hires-glenn-leland-as-chief-growth-officer> (Press Release dated Mar 3, 2016 – *Priority Ambulance Hires Glenn Leland as Chief Growth Officer*). AMR offers no justification for its failure to present information relating to the hiring of Mr. Leland to the ALJ before the record closed, nor do we agree any justification is appropriate. The Director should not consider that evidence for the first time now, after there has been a final decision. At some point the parties must not be allowed to continue to present new evidence, particularly evidence that could have been found through a Google search more than a month before the record closed.

That having been said, a summary of Mr. Leland’s professional experience is attached as Exhibit A. He is a class individual and professional who spent more than a decade working for AMR and other ambulance and health service companies. He is lauded and respected in his field. Mr. Leland was hired to try to turn around a company, TransCare, that had been failing for

a long time. He was one of a series of CEOs for TransCare, and spent just over a year trying to turn the company around. He left when the problems with the company, and the company's owner, proved insurmountable. He was not employed by TransCare when it filed for bankruptcy. Moreover, if hiring an employee who was involved with a company that filed for bankruptcy makes an ambulance provider not fit and proper, then AMR is in a glass house throwing stones because its own employee roster and management are riddled with people who worked at Rural Metro when it filed for its bankruptcy. Frankly, many of them are probably very good at what they do as EMS professionals and had very little to do with the Rural Metro bankruptcies. It is easy to raise the inference of causation for a bankruptcy, particularly as an intervenor in a CON hearing, but not so easy to establish any kind of plausible connection or causation. Bankruptcy is complex, and the reasons why proceedings are initiated under the Bankruptcy Code are many – including the inability to consummate a workout with lenders.

4. The Granting of a CON Does Not Mean the Director Has No Oversight.

Lastly, the Director has the authority to ensure that CON holders remain fit and proper to provide ambulance service. After a CON has been awarded, AAC R9-25-912 gives the Director the authority to take disciplinary action against a CON holder, including suspension or revocation, for a variety of reasons including substandard performance; providing false information; or failure to comply with the requirements of the CON. The Director retains control over CON holders and has the tools to ensure continued competent performance.

5. AMR's Motion for Rehearing Should Be Denied.

Maricopa Ambulance has been through weeks of hearing spanning four months. It has been through two months of post-hearing briefing that covered a couple hundred pages and explored – in often excruciating detail – all but one issue that AMR rehashes in its *Motion for*

Rehearing. After what Maricopa Ambulance presumes was a meticulous review of the record, the ALJ ruled that the law and evidence favored granting Maricopa Ambulance a CON. The Director adopted the ALJ's recommendation with certain amendments. Nothing AMR has raised in its *Motion for Rehearing* should change this decision. The ALJ's recommendation and the Director's decision are supported by the evidence, are consistent with the applicable law, and the evidence AMR suggests is "new" is not new at all, and in any event is totally inadequate to justify a reversal of the Director's decision.

AMR's *Motion for Rehearing* should be denied.

Respectfully submitted this 30th day of June, 2016.

COPPERSMITH BROCKELMAN PLC

By /s/ James J. Belanger
James J. Belanger
Kathy A. Steadman
Scott M. Bennett
Attorneys for Maricopa Ambulance, LLC

CERTIFICATE OF SERVICE

ORIGINAL filed using the OAH electronic document filing system
<https://portal.azoah.com/oedf> this 30th day of June, 2016, with copies provided to all parties on the approved mailing list this 30th day of June, 2016, by posting through the designated OAH website at <https://portal.azoah.com/oedf/documents/2015A-EMS-0187-DHS/index.html>.

By: /s/ Heather Babel

EXHIBIT A

Glenn Leland

Chief Growth Officer

Summary

An intuitive and visionary strategist with significant experience in developing healthcare service businesses, leading change and creating shareholder value. Major strengths include general management, strategic planning, business development and analytical decision-making. Persuasive communicator with a successful track record in forming alliances, negotiating contracts and getting results through utilizing the talents and abilities of others. Internationally recognized expert in emergency medical services (EMS) management and system design.

Specialties: General management, strategic planning, sales management, Emergency Medical Services (EMS) system design and operations.

Experience

Chief Growth Officer at Priority Ambulance

March 2016 - Present (4 months)

Priority Ambulance has hired Glenn Leland as chief growth officer to oversee the strategy of the company's rapid national expansion.

Leland will manage mergers and acquisitions, business development, sales and marketing for the national ambulance network of Priority Ambulance. Since its founding in 2014, Priority Ambulance has experienced substantial growth and expanded its network into six states. The company today operates more than 250 emergency vehicles and aircrafts and employs more than 1,000 EMTs, paramedics, telecommunicators and billing specialists in Tennessee, Alabama, Georgia, New York, Indiana and Pennsylvania.

“With a foundation of excellent patient care and promoting community health, Priority Ambulance is a dynamic, rapidly growing company,” Priority Ambulance CEO Bryan Gibson said. “As we continue to evaluate new business opportunities and growth plans, a member of our leadership team focused solely on strategic growth of our footprint and service offerings will help our company continue be a leader in the EMS industry.

“Glenn’s expertise in strategic planning and business development will be essential to our strategy to create sustainable growth and success.”

Leland has more than 35 years of experience in leadership and strategy at national and international EMS companies. Leland began his EMS career as an EMT and paramedic and was subsequently promoted into

teaching, operations and marketing leadership roles. His early experience working on an ambulance provides a solid foundation on the fundamentals of emergency medical services.

Instructor at University of Maryland Baltimore County

2010 - Present (6 years)

Teach strategy and business development as part of the Graduate Health Services program.

Chief Executive Officer at TransCare

January 2015 - January 2016 (1 year 1 month)

TransCare provides essential mobile services for people in need. With operations in Greater New York City, and throughout the Hudson Valley NY, Pittsburgh PA and Baltimore MD, TransCare is one the largest ambulance services in the United States and also a major provider of transit services for New Yorkers with disabilities. Its 1,900 employees transport 300 thousand patients and 300 thousand transit passengers annually.

TransCare is the primary emergency ambulance service and ALS response provider in many of the suburban communities it serves, but also is a unique participant in the inner-city urban New York City EMS system. TransCare hospital-branded 911 ambulances represent 10% of New York City 911 related transports and an estimated 70% of 911 ambulance services in the Bronx.

TransCare has deep and growing relationships with its hospital partners providing mobile integrated healthcare, dedicated CCT transports (including IABP and ECMO), other dedicated patient transportation services, donor organ retrieval support, call centers management and provides on-site transportation coordination and patient logistics support to some of the best known hospitals in the Northeast.

Glenn's role as the leader of the company include being the chief strategist, setting the course for the company, the chief revenue officer growing top line, while also supervising all functional areas of the company. His strategy is to reimagine services and value proposition to a rapidly evolving healthcare marketplace and turn a cash-strapped transportation supplier with a challenging infrastructure. In the first several months, EBITDA improved greater than \$1.7M per month. He reports to the Board of Directors in a challenging, non-traditional private-equity based company with complex financing.

Chief Strategy Officer at ProTransport-1

July 2012 - January 2015 (2 years 7 months)

ProTransport-1 was named one of the 5,000 fastest-growing private companies in America in 2011 and 2012 by Inc. Magazine, and Ernst & Young named its founders as a finalist for its Entrepreneur of the Year honor in the spring. The company focuses on interfacility medical transportation, and is an effective competitor in the marketplace. ProTransport-1 has an impressive on-time performance record and an innovative customer satisfaction scoring system, which documents its high quality service.

ProTransport-1 serves 14 Northern California Counties. Their clients include Stanford Hospitals, Lucile Packard Children's Hospital, Dignity Health System, Sutter Health Foundation, HCA Hospitals, Tenet Hospitals, the San Jose Sharks and the San Francisco 49ers. Glenn's role is to develop strategy and oversee its execution, and guides the development of the leadership team, as the company continues and accelerates its growth under private equity support. In addition to strategic initiatives, Glenn oversees clinical operations, quality improvement, legal services, information technology, product development, special projects and purchasing for ProTransport-1 and its affiliate Integrated Transport Services.

Mission Trip Leader (Volunteer) and Member Board of Directors at Visiting Orphans

September 2011 - January 2014 (2 years 5 months)

James 1:27 Religion that God our Father accepts as pure and faultless is this; to look after orphans and widows in their distress and to keep oneself from being polluted by the world.

Visiting Orphans conducts many missions trips for churches, schools, and individuals from around the United States to orphanages all around the world including China, Ethiopia, Rwanda, Uganda, Ghana, Kenya, Ecuador, Ukraine, Haiti, El Salvador, Honduras, India and Costa Rica.

My wife Daria and I lead trips to Ethiopia and Rwanda in late December. It is an extraordinary place. Please join us for a life-changing opportunity. For you and for the orphans you will meet.

For more information go to www.VisitingOrphans.org

I joined the Board of Directors in November 2013

Senior Vice President, EMS at American Medical Response

November 2009 - June 2012 (2 years 8 months)

President at Strategic Fit, Inc.

September 2005 - December 2010 (5 years 4 months)

Boutique management consulting firm specializing in health care systems, and especially emergency medical services system design. Clients mostly government, but also large provider organizations, in the Americas, Europe, Middle East and Asia.

Chief Operating Officer at EMSA

March 2007 - November 2009 (2 years 9 months)

Chief Operating Officer of one of the world's premiere emergency medical service organizations. Serving 1.4 million people in Oklahoma, including Tulsa and Oklahoma City, EMSA responds to over 135,000 medical emergencies annually, and is proud of both its superb clinical results and economic efficiency.

Executive Vice President, Strategy at American Medical Response, Inc.

December 1994 - September 2005 (10 years 10 months)

Joined company during early phase of growth, ultimately growing from revenues of \$50M to \$1.8B annually.

Volunteer Experience

Trip Leader at Visiting Orphans

James 1:27 Religion that God our Father accepts as pure and faultless is this; to look after orphans and widows in their distress and to keep oneself from being polluted by the world.

Education

Northwestern University - Kellogg School of Management

MBA, Strategy, Finance & Marketing, 2004 - 2006

Daniel Freeman Hospital Paramedic School

Paramedic Training, 1978 - 1978

Interests

Leadership development, healthcare policy, business development

Glenn Leland

Chief Growth Officer



14 people have recommended Glenn

"Glenn Leland, MPA, has been serving as an adjunct instructor in our graduate program for several years now. Mr. Leland has an excellent grasp of the material and has received excellent evaluations from students. Our program is a hybrid of online and onsite delivery modalities, with Glenn delivering his lectures and interaction with students from a distance. As you know, this is more difficult to do well than interacting with students in a face-to-face environment. Glenn has gone out of his way to make sure that students understand the material and that they can use it in both likely and unusual scenarios. I am totally sure that Glenn can do an excellent job of delivering course material in person, having witnessed several lectures he has done with both small and large groups. In our experience, Glenn Leland is in the top 5% of instructors we have worked with over the years, and I recommend him to you enthusiastically and with no reservations. If you have any questions, please feel free to contact me directly at Bissell@umbc.edu. Sincerely, Richard A. Bissell, PhD Professor and Graduate Program Director"

— **Rick Bissell**, managed Glenn at University of Maryland Baltimore County

"As a CFO of several successful, entrepreneurial companies over the last 20 years, I have been blessed with working with some very notable, successful, talented, and strategic CEO's. Glenn is by far the best senior executive in any field of endeavor I have had the privilege to work for. He is a leader, highly ethical, a great communicator & teacher, and a strong strategic thinker. As a CEO he gathers information and finds solutions. He creates consensus within the organization, and an atmosphere that no challenge is too difficult to be overcome. He communicates clearly, builds great teams of talented people and utilizes them effectively. In short - Glenn Leland is one of the finest, most strategic, knowledgeable minds working today in the fields of Healthcare and Transportation. As a senior executive he is at the top of the pyramid understanding not just what it takes to be good, but what it takes to be great. Glenn understands that a CEO needs to lead, and that good leadership is about vision, passion, and creating the culture & environment where the truth is heard, answers are found and both people & technology are harnessed to create the opportunity for growth and success. As CEO he was able to create a plan to translate Transcare's vision and strategy into a coherent set of performance measures. These included financial measures, customer knowledge, internal business processes, and learning and accelerating growth to achieve desired outcomes. In just 3 months, after 9 consecutive months of losses, there was an unprecedented \$1.7MM turn-around in profitability - resulting in monthly EBITDA of \$1MM. This was also accomplished on a shoe-string budget, limited cash resources, and zero

capital investment. He is exactly the person you want as CEO of your company, as he personifies excellence as both an executive and as an individual. "

— **Mark Bonilla**, *Chief Financial Officer, Treasurer, Controller, TCC Inc*, reported to Glenn at TransCare

"Glenn is one of the most creative and strategic thinkers with whom I've had the pleasure to work. He has a flexible and agile mind with the capability to look at a problem and construct a completely novel approach and solution. When faced with significant and frustrating obstacles, he always calmly and methodically deconstructs the problem and then attacks the pieces until he can put the situation back together again. I first worked with Glenn in the 80's when he ran the SoCal operations and I ran a NorCal division of Medevac. Through the years and consolidation of the industry, we have been coworkers and competitors at various times. He is an awesome coworker and a real team player. He is also a fierce competitor with the creativity to up the game every time. Were I to own a Medical Transportation or Mobile Healthcare company, he would be perhaps the first person that I would try to recruit."

— **David Shrader**, *President, The Polaris Group*, worked with Glenn at TransCare

"I was fortunate enough to have the opportunity and great pleasure of working with Glenn when he was the Chief Strategy Officer (CSO) at Protransport-1. He's the most intelligent, thoughtful, kind and pleasant person I have ever worked with. I really miss his insights and forward thinking. At Protransport-1 I thought of him as a mentor. He supported my ideas and clearly understood the innovations I tried to bring forth. I would greatly enjoying working with or for him again in the future."

— **Jeff Fleisher**, *Director of Information Technology, ProTransport-1*, worked with Glenn at ProTransport-1

"There are people in the EMS community you hear or read about and wonder, 'wow, their awesome, I wonder what it would be like to work with someone like that.' I was teaching at ProTransport-1 when I was invited to come onboard and during my interview preparations I saw that Glenn Leland was on my panel and I was elated to simply have the opportunity to sit across the table from him. Several months later, on nearly every Monday, I would get to sit at the table with him, I it was both an honor and a privilege. Glenn has an unparalleled wealth of knowledge and is humble enough to share his intellect whenever possible. I admire that, because as a leader, you must take the time to educate, cultivate, encourage, and support fellow leaders and subordinates. Glenn is well connected because of his ability to build and maintain relationships, not because he is infamous, but because his engaging and intriguing conversations leave you asking yourself more thought provoking questions and you just want to know more. I had the pleasure of working with Glenn while he introduced us to Balanced Scorecard. I took this very seriously and am delighted to report the successful completion of my project which included a department reorganization and multiple business systems improvements, with his guidance. His style of being a transformational leader was ever present in the performance of his duties as the Chief Strategy Officer at ProTransport-1. Now that I have had a taste, I

will pursue studies in strategy and organizational behavior as Glenn as instrumental in helping me see where I could make the greatest impact wherever I may go. Given the opportunity, I would work with Glenn again."

— **Andre Jones, MPA, MS, ENP**, *Director of Communications (Contact Center, Control Centers, Transfer Center, Call Center)*, *ProTransport-1*, worked indirectly for Glenn at ProTransport-1

"I met Glenn back in the California Medevac days. It's good to have friends from those days and see them do well."

— **Thomas Little**, worked with Glenn at American Medical Response

"Glenn is one of the most creative and strategic thinkers with whom I've had the pleasure to work. He has a flexible and agile mind with the capability to look at a problem and construct a completely novel approach and solution. When faced with significant and frustrating obstacles, he always calmly and methodically deconstructs the problem and then attacks the pieces until he can put the situation back together again. I first worked with Glenn in the 80's when he ran the SoCal operations and I ran a NorCal division of Medevac. Through the years and consolidation of the industry, we have been coworkers and competitors at various times. He is an awesome coworker and a real team player. He is also a fierce competitor with the creativity to up the game every time. Were I to own a Medical Transportation or Mobile Healthcare company, he would be perhaps the first person that I would try to recruit."

— **David Shrader**, *President, The Polaris Group*, worked with Glenn at EMSA

"I've worked with Glenn in various organizational configurations since 1989. He's one of those rare people who can see whole complex systems in their entirety in his mind. This unique talent allows Glenn to see things no one else sees....connections, potential breakdowns, and amazing opportunities. This talent combined with an ability to explain what he sees using stories that anyone can understand makes him one of the most dynamic leaders I've ever seen."

— **Mike Taigman**, worked directly with Glenn at EMSA

"Glenn has been responsive in his varied roles, pragmatic in his approach, realistic in his suggestions, articulate in his presentations and, a pleasure to work with."

— **Stewart Greisman**, worked with Glenn at EMSA

"Glenn is a highly focused, extremely intelligent and energetic individual who provides any organization in the medical arena with a results oriented Executive. I was involved with Glenn's last company and found him to be strong both tactically and strategically. He has a methodical approach to solving business problems and opportunities that will be advantageous to any organization."

— **Scott Munro**, was Glenn's client

"Glenn Leland has a degree of intelligence in creating the future that is unmatched by other individuals. Glenn is articulate in his speech and communicates his thoughts on a subject clearly without being pretentious or showy. I would recommend Glenn to any team desiring a high degree of responsibility, sophistication and loyalty."

— **Jeff Forster**, was with another company when working with Glenn at EMSA

"Glenn always delivers a professionally finished product with trusted results. His value as a strategic long-range planner is a necessary requirement for any large or small-scale program. His area knowledge is thorough and detailed. His ability to communicate effectively at all levels makes his consultation a necessity for seeing through to the end result."

— **David Babb**, was Glenn's client

"Glenn is bright, articulate and has shown strong ability to think strategically. He can add real value to a variety of organizations as a consultant."

— **Derek Skene**, was with another company when working with Glenn at EMSA

"Glenn provided decisive leadership in developing, negotiating and closing a complicated international joint venture in the Caribbean. It was a pleasure to work with him on the project."

— **Gil Rosenthal**, was a consultant or contractor to Glenn at American Medical Response, Inc.

Contact Glenn on LinkedIn

EXHIBIT B

place during the relevant time period. In December 2014 Michael Scerbo's computer crashed compromising much of the data on his computer. A copy of the work order can be provided upon request. Although he was able to recover some documents and communication, much of it was lost. Rose Allyn Moser Public & Online Relations has provided all of the documentation that was recovered.

Dated this 18th day of February, 2016.

Jason Rose

STATE OF ARIZONA)
) ss
County of Maricopa)

The foregoing Affidavit of Jason Rose was subscribed and sworn to before me this 18th day of February, 2016, by ~~Jan Martin~~.

Hopi Slaughter

Hopi L. Slaughter
Notary Public

My commission expires: MARCH 24, 2017

