U.S. Department of Labor

Benefits Review Board
200 Constitution Ave. NW
Washington, DC 20210-0001

BRB No. 20-0394 BLA

MARGARET WOOSLEY (o/b/o JOHNNY R. WOOSLEY)	)	
Claimant-Respondent	)	
v.	)	
JEWELL RIDGE COAL CORPORATION	)	
and	)	
PITTSON COMPANY	)	DATE ISSUED: 09/24/2021
Employer/Carrier-Petitioners	)	
DIRECTOR, OFFICE OF WORKERS' COMPENSATION PROGRAMS, UNITED STATES DEPARTMENT OF LABOR	)	
Party-in-Interest	)	DECISION and ORDER

Appeal of the Decision and Order Awarding Benefits of Timothy J. McGrath, Administrative Law Judge, United States Department of Labor.

Joseph E. Wolfe and Brad A. Austin (Wolfe, Williams & Reynolds), Norton, Virginia, for Claimant.

Kendra R. Prince (Penn, Stuart & Eskridge), Abingdon, Virginia, for Employer.

Before: BOGGS, Chief Administrative Appeals Judge, GRESH and JONES, Administrative Appeals Judges.

PER CURIAM:

Employer appeals Administrative Law Judge (ALJ) Timothy J. McGrath's Decision and Order Awarding Benefits (2018-BLA-05184) rendered on a miner's subsequent claim[1] filed pursuant to the Black Lung Benefits Act, as amended, 30 U.S.C. §§901-944 (2018) (Act).

The ALJ credited the Miner with thirty-eight years of qualifying coal mine employment and found he had a totally disabling respiratory or pulmonary impairment. 20 C.F.R. §718.204(b)(2). He therefore found Claimant[2] established a change in an applicable condition of entitlement[3] and invoked the presumption of total disability due to pneumoconiosis at Section 411(c)(4) of the Act,[4] 30 U.S.C. §921(c)(4) (2018); 20 C.F.R.

[1] This is the Miner's fourth claim for benefits. Director's Exhibit 1. ALJ Richard T. Stansell-Gamm denied his most recent prior claim, filed on March 6, 2009, because the Miner failed to establish total disability or the existence of pneumoconiosis. *Id.* The Miner took no further action until filing the current claim on April 15, 2014. Director's Exhibit 3.

[2] Claimant is the widow of the Miner, who died on August 7, 2017, while this case was pending before the district director. Claimant's Exhibit 7; *see* Director's Exhibit 28. Claimant is pursuing the Miner's claim on his behalf. December 14, 2018 Order Amending Case Caption.

[3] When a miner files a claim for benefits more than one year after the final denial of a previous claim, the ALJ must also deny the subsequent claim unless he finds "one of the applicable conditions of entitlement . . . has changed since the date upon which the order denying the prior claim became final." 20 C.F.R. §725.309(c); *White v. New White Coal Co.*, 23 BLR 1-1, 1-3 (2004). The "applicable conditions of entitlement" are "those conditions upon which the prior denial was based." 20 C.F.R. §725.309(c)(3). ALJ Stansell-Gamm denied the Miner's most recent prior claim because he failed to establish total disability or the existence of pneumoconiosis; therefore, Claimant had to submit new evidence establishing one of these elements of entitlement to have her case considered on the merits. 20 C.F.R. §725.309(c).

[4] Section 411(c)(4) of the Act provides a rebuttable presumption that a miner was totally disabled due to pneumoconiosis if he had at least fifteen years of underground or substantially similar coal mine employment and a totally disabling respiratory impairment. 30 U.S.C. §921(c)(4) (2018); *see* 20 C.F.R. §718.305

§725.309(c). He further found Employer did not rebut the presumption and awarded benefits.

On appeal, Employer argues the ALJ erred in finding Claimant established total disability and invoked the Section 411(c)(4) presumption. Employer further argues he erred in finding it did not rebut the presumption.[5] Claimant responds in support of the award of benefits. The Director, Office of Workers' Compensation Programs, has not filed a response brief.

The Benefits Review Board's scope of review is defined by statute. We must affirm the ALJ's Decision and Order if it is rational, supported by substantial evidence, and in accordance with applicable law.[6] 33 U.S.C. §921(b)(3), as incorporated by 30 U.S.C. §932(a); *O'Keeffe v. Smith, Hinchman & Grylls Associates, Inc.*, 380 U.S. 359 (1965).

Invocation of the Section 411(c)(4) Presumption – Total Disability

A miner was totally disabled if he had a pulmonary or respiratory impairment which, standing alone, prevented him from performing his usual coal mine work and comparable gainful work. *See* 20 C.F.R. §718.204(b)(1). A claimant may establish total disability based on pulmonary function studies, arterial blood gas studies, evidence of pneumoconiosis and cor pulmonale with right-sided congestive heart failure, or medical opinions. 20 C.F.R. §718.204(b)(2)(i)-(iv). The ALJ must weigh all relevant supporting evidence against all relevant contrary evidence. *See Rafferty v. Jones & Laughlin Steel Corp.*, 9 BLR 1-231, 1-232 (1987); *Shedlock v. Bethlehem Mines Corp.*, 9 BLR 1-195, 1-198 (1986), *aff'd on recon.*, 9 BLR 1-236 (1987) (en banc). Qualifying evidence in any of the four categories establishes total disability when there is no "contrary probative evidence." 20 C.F.R. §718.204(b)(2).

The ALJ found the pulmonary function studies and medical opinions established total disability, 20 C.F.R. §718.204(b)(2)(i), (iv), while the arterial blood gas studies did

[5] We affirm, as unchallenged on appeal, the ALJ's finding that the Miner had at least thirty-eight years of qualifying coal mine employment. *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710, 1-711 (1983); Decision and Order at 3.

[6] This case arises within the jurisdiction of the United States Court of Appeals for Fourth Circuit because the Miner performed his coal mine employment in Virginia. *See Shupe v. Director, OWCP*, 12 BLR 1-200, 1-202 (1989) (en banc); Hearing Transcript at 9-10.

not.[7] 20 C.F.R. §718.204(b)(2)(ii); Decision and Order at 26-29. Weighing all the evidence together, he found the evidence established a totally disabling respiratory impairment. Decision and Order at 30. Employer argues the ALJ erred in finding Claimant established total disability based on the pulmonary function studies and medical opinion evidence. 20 C.F.R. §718.204(b)(2)(i), (iv). We disagree.

Pulmonary Function Studies

The ALJ considered two pulmonary function studies dated May 30, 2014 and April 4, 2016,[8] both of which produced qualifying values[9] before and after the administration of bronchodilators. Decision and Order at 13, 26-27; Director's Exhibits 12, 15. The ALJ noted Drs. Gallup and Ranavaya concluded the May 30, 2014 study was acceptable but Dr. Sargent opined the April 4, 2016 pulmonary function study was invalid. Decision and Order at 26-27; Director's Exhibits 12, 15. Giving no weight to the April 4, 2016 pulmonary function study, the ALJ found the May 30, 2014 pulmonary function study established total disability. Decision and Order at 27.

Employer initially contends the ALJ did not address Dr. Sargent's opinion that the May 30, 2014 pulmonary function study is invalid. Employer's Brief at 6-8. We disagree.

Contrary to Employer's argument, *Id.*, Dr. Sargent did not specifically opine the May 30, 2014 pulmonary function study is invalid. He opined his own April 4, 2016 pulmonary function study was invalid because the Miner was "just much too weak and frail" to put forth a valid effort, Employer's Exhibit 4 at 11, and he explained how a physician determines whether a pulmonary function study is valid. Employer's Exhibit 4 at 12. Although Dr. Sargent stated "Dr. Gallup also had trouble getting valid [p]ulmonary [f]unction [t]esting," Employer's Exhibit 4 at 11-12, he did not specifically state the May

[7] The ALJ further found there is no evidence the Miner suffered from cor pulmonale with right-sided congestive heart failure. 20 C.F.R. §718.204(b)(2)(iii); Decision and Order at 27.

[8] The ALJ noted the Miner was over seventy-one years old when he performed each study. Decision and Order at 26 n.42. He also noted a discrepancy in the Miner's heights recorded in the two studies, and found the Miner was actually sixty-eight inches tall (the height reflected in the April 4, 2016 study) because this height was more consistent with those reported in the Miner's treatment notes. Decision and Order at 13 n.24.

[9] A "qualifying" pulmonary function study yields values that are equal to or less than the applicable table values listed in Appendix B of 20 C.F.R. Part 718. A "non-qualifying" study exceeds those values. 20 C.F.R. §718.204(b)(2)(i).

30, 2014 study is invalid. Moreover, there is no indication Dr. Sargent reviewed the tracings from the May 30, 2014 study, and Employer did not submit a physician's interpretation of it. *See* 20 C.F.R. §725.414(a)(3)(ii) (in rebuttal of a claimant's case, the responsible operator is entitled to submit "no more than one physician's interpretation of each . . . pulmonary function test . . ."). Employer's argument therefore lacks merit.

We further reject Employer's assertion that the ALJ failed to explain his conclusion that the May 30, 2014 pulmonary function study is valid. Employer's Brief at 8. The ALJ specifically noted Drs. Gallup and Ranavaya concluded the May 30, 2014 study was acceptable. Decision and Order at 26; Director's Exhibit 12 at 3-4. While the ALJ's explanation might be cursory, it is clear he permissibly relied on their opinions to conclude the May 30, 2014 study is valid. *See Mingo Logan Coal Co. v. Owens*, 724 F.3d 550, 557 (4th Cir. 2013) (if a reviewing court can discern what the ALJ did and why he did it, the duty of explanation under the Administrative Procedure Act is satisfied); *Harman Mining Co. v. Director, OWCP* [*Looney*], 678 F.3d 305, 316 (4th Cir. 2012); *Keener v. Peerless Eagle Coal Co.*, 23 BLR 1-229, 1-237 (2007) (en banc); 20 C.F.R. §§718.101(b), 718.103(c); 20 C.F.R. Part 718, Appendix B. As Employer raises no further challenge to the ALJ's weighing of the pulmonary function study evidence, we affirm his finding that Claimant established total disability at 20 C.F.R. §718.204(b)(2)(i).

Medical Opinion Evidence

Employer next asserts the ALJ erred in finding the medical opinion evidence establishes disability. Employer's Brief at 10-15. We disagree.

The ALJ considered the medical opinions of Drs. Gallup and Sargent.[10] Decision and Order at 27-29. Dr. Gallup opined the Miner had a "severe cardio pulmonary impairment and is totally disabled from his impairment to perform his last coal mine job." Director's Exhibit 12 at 19. He later revised his opinion, concluding the Miner's cardiac stenosis was a significant factor to his pulmonary limitations, and pneumoconiosis was a "minor contributor" to the Miner's disability that would not, "in and of itself" prevent him from performing his last coal mine work. *Id.* at 1. Dr. Sargent opined the Miner was "disabled from doing any gainful employment based on his critical aortic stenosis, previous stroke, and overall health." Director's Exhibit 15 at 3. He noted that, while the April 4, 2016 pulmonary function testing was not valid, the "best effort" test result suggested a moderate obstructive lung defect, severe lung defect, and moderate decrease in diffusing

[10] The ALJ also discussed the opinions of Drs. Caffrey and Mitchell, but accurately noted neither physician provided a specific opinion as to whether the Miner was disabled. Decision and Order at 28; Claimant's Exhibits 3, 4; Employer's Exhibit 3.

capacity, which he opined may be caused by severe dorsal kyphosis, aortic stenosis, and congestive heart failure. *Id.*; Employer's Exhibit 4 at 20. He further indicated that, while he did not believe the Miner had a disabling respiratory or pulmonary impairment from coal dust exposure, he could not rule out the presence of a pulmonary impairment. Employer's Exhibit 4 at 20.

The ALJ gave "some weight" to Dr. Gallup's opinion, concluding he "set forth a reasoned medical opinion that [the] Miner had a severe cardiopulmonary impairment that prevented him from performing past coal mine employment." Decision and Order at 28. In contrast, the ALJ found Dr. Sargent "failed to set forth a well-reasoned medical opinion as to whether [the] Miner had a respiratory or pulmonary impairment that prevented him from performing past coal mine employment" because he did not address the Miner's need for supplemental oxygen and "hedged" his opinion regarding whether the Miner suffered from a totally disabling respiratory or pulmonary impairment. Decision and Order at 28, *quoting* Director's Exhibit 3 at 3.

Employer asserts the ALJ erred in discrediting the opinion of Dr. Sargent that the Miner did not have a totally disabling respiratory or pulmonary impairment. Employer's Brief at 11-13. We disagree.

As the ALJ correctly noted, Dr. Sargent "hedged" his opinion regarding whether the Miner was totally disabled. Decision and Order at 28. Dr. Sargent noted the Miner's "normal" pulmonary function study results from several years before the Miner's current application for benefits, Employer's Exhibit 4 at 12, and specifically asserted the Miner did not have a disabling impairment caused by coal mine dust exposure, *id.* at 14, 20. He conceded, however, that the Miner could have been suffering from a respiratory or pulmonary impairment caused by his aortic stenosis. *Id.* at 14. Moreover, Dr. Sargent admitted he was unable to definitively opine as to whether the Miner had a disabling pulmonary impairment at the time of his death. *Id.* at 20. Thus, to the extent Dr. Sargent's opinion regarding the Miner's disability was definitive, it was only to assert the Miner's disability, if any, was not caused by coal mine dust exposure. *Id.* The relevant issue at 20 C.F.R. §718.204, however, is whether the Miner suffered from a disabling pulmonary or respiratory impairment which, standing alone, prevents him from performing his usual coal mine work. 20 C.F.R. §718.204(b)(1). The ALJ therefore permissibly discredited Dr. Sargent's opinion.[11] *See Milburn Colliery Co. v. Hicks*, 138 F.3d 524, 533 (4th Cir. 1998);

[11] Employer further asserts the ALJ improperly substituted his own opinion for that of the medical experts in finding the Miner's need for supplemental oxygen undermines Dr. Sargent's opinion. Employer's Brief at 12-13. Because we affirm the ALJ's rejection

Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 441 (4th Cir. 1997); 20 C.F.R. §718.20(b)(2)(iv); Decision and Order at 28.

Employer further argues the ALJ's reliance on Dr. Gallup's opinion "does not ultimately support his finding" because Dr. Gallup opined the Miner's cardiac condition was the primary cause of his impairment.[12] Employer's Brief at 13. Alternatively, it contends Dr. Gallup's opinion is inadequately documented and not well-reasoned because he did not have access to the entirety of the Miner's medical record. *Id.* at 13-14. Employer's arguments have no merit.

As Employer acknowledges, Dr. Gallup specifically opined the Miner has a totally disabling cardiopulmonary impairment. Employer's Brief at 13; Director's Exhibit 12 at 19. Contrary to Employer's argument, Dr. Gallup did not opine in his supplemental opinion that the Miner does not have a totally disabling respiratory or pulmonary condition but rather updated his opinion to note he believed the Miner's cardiac condition was the most significant factor in causing the Miner's respiratory disability. Director's Exhibit 12 at 1. As noted above, the relevant issue at 20 C.F.R. §718.204 is whether the Miner suffered from a disabling pulmonary or respiratory impairment which, standing alone, prevents him from performing his usual coal mine work. 20 C.F.R. §718.204(b)(1). To the extent Employer asserts the Miner's pulmonary disability is due to his cardiac condition, the etiology of the impairment is properly addressed under the disability causation element or rebuttal of the presumption of total disability due to pneumoconiosis. 20 C.F.R. §§718.204(c), 718.305(d)(1)(ii).

Moreover, in asserting Dr. Gallup's opinion lacks probative value because he did not review the entire record, Employer essentially asks the Board to reweigh the evidence, which we are not empowered to do. *Anderson v. Valley Camp of Utah, Inc.*, 12 BLR 1-111, 1-113 (1989). Whether the conclusions set forth in a medical opinion are documented and reasoned is a determination committed to the ALJ's discretion. *See Hicks*, 138 F.3d at 533; *Akers*, 131 F.3d at 441. It is the ALJ's prerogative to weigh the conflicting evidence, and the Board may not reweigh it. *See Island Creek Coal Co. v. Compton*, 211 F.3d 203,

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of Dr. Sargent's opinion on alternate grounds, we need not address Employer's contention of error. *See Kozele v. Rochester & Pittsburgh Coal Co.*, 6 BLR 1-378, 1-382 n.4 (1983).

[12] Employer further argues the ALJ erred in crediting Dr. Gallup's opinion because, in relying on invalid pulmonary function testing, it was not well-reasoned or documented. Employer's Brief at 13-14. As noted above and contrary to Employer's assertion, the record does not establish that the May 30, 2014 pulmonary function study was invalid.

211 (4th Cir. 2000). We therefore affirm the ALJ's finding that the medical opinion evidence established total disability. 20 C.F.R. §718.204(b)(2).

Weighing the totality of the probative medical evidence, the ALJ found Claimant established the Miner was totally disabled by a pulmonary or respiratory impairment.[13] Decision and Order at 30. As Employer raises no further arguments as to the ALJ's finding that Claimant established the existence of a totally disabling respiratory or pulmonary impairment, we affirm his finding that Claimant invoked the Section 411(c)(4) presumption.

Rebuttal of the Section 411(c)(4) Presumption

Because Claimant invoked the Section 411(c)(4) presumption, the burden shifted to Employer to establish the Miner had neither legal[14] nor clinical[15] pneumoconiosis, 20 C.F.R. §718.305(d)(2)(i), or "no part of the [M]iner's respiratory or pulmonary total

[13] Employer further contends the ALJ erred in considering the statements that the Miner made concerning his condition prior to his death, asserting that, because this is a living miner's claim, a finding that the Miner had a totally disabling impairment may not be based on the Miner's statements. Employer's Brief at 15-17. While Employer correctly notes the regulations provide that a finding of total disability in a living miner's claim may not be based solely on the Miner's statements, Employer's Brief at 15, *citing* 20 C.F.R. §718.204(d)(5), the Miner's statements as to his "physical condition are relevant and shall be considered in making a determination as to whether the miner was totally disabled at the time of death." 20 C.F.R. §718.204(d)(4). Here, the ALJ did not rely solely on the Miner's statements but also found the pulmonary function study and medical opinion evidence established total disability. Decision and Order at 27-30. Employer's argument therefore lacks merit.

[14] "Legal pneumoconiosis" includes any chronic lung disease or impairment and its sequelae arising out of coal mine employment. 20 C.F.R. §718.201(a)(2). The definition includes "any chronic pulmonary disease or respiratory or pulmonary impairment significantly related to, or substantially aggravated by, dust exposure in coal mine employment." 20 C.F.R. §718.201(b).

[15] "Clinical pneumoconiosis" consists of "those diseases recognized by the medical community as pneumoconioses, *i.e.*, the conditions characterized by permanent deposition of substantial amounts of particulate matter in the lungs and the fibrotic reaction of the lung tissue to that deposition caused by dust exposure in coal mine employment." 20 C.F.R. §718.201(a)(1).

disability was caused by pneumoconiosis as defined in [20 C.F.R.] §718.201." 20 C.F.R. §718.305(d)(2)(ii). The ALJ found Employer failed to establish rebuttal by either method.

In addressing rebuttal of clinical pneumoconiosis, the ALJ considered the x-ray, computed tomography (CT) scan, and autopsy evidence. Decision and Order at 22-23. Although he found the x-ray and CT scan evidence did not establish clinical pneumoconiosis, the ALJ credited the opinions of Drs. Stancel and Caffrey that the autopsy evidence established the disease. *Id*. He therefore found Employer failed to disprove the Miner had clinical pneumoconiosis. *Id.* at 22-23, 32. He further correctly found Employer's failure to disprove clinical pneumoconiosis precludes a finding it rebutted the Section 411(c)(4) presumption by establishing the absence of pneumoconiosis. 20 C.F.R. §718.305(d)(1)(i). Employer does not challenge the ALJ's finding that it failed to rebut the existence of pneumoconiosis. That finding is therefore affirmed. Decision and Order at 32; *see Skrack v. Island Creek Coal Co*., 6 BLR 1-710, 1-711 (1983).

The ALJ next considered whether Employer established "no part of the [M]iner's respiratory or pulmonary total disability was caused by pneumoconiosis as defined in [20 C.F.R.] §718.201." 20 C.F.R. §718.305(d)(1)(ii); Decision and Order at 32-34. He considered the opinions of Drs. Sargent and Caffrey, who opined the Miner's disability was entirely caused by his cardiac condition and unrelated to pneumoconiosis, and Dr. Gallup, who opined that, while the Miner's disability was primarily caused by his cardiac condition, pneumoconiosis was also a contributing factor to his disability. Decision and Order at 32-34; Director's Exhibits 12, 15; Employer's Exhibit 4. The ALJ discredited the opinion of Dr. Sargent as unreasoned because he did not diagnose clinical pneumoconiosis, contrary to the ALJ's finding that Claimant established the existence of the disease, and because Dr. Sargent's rationale is inconsistent with the regulations, which recognize that pneumoconiosis is a latent and progressive disease that may develop years after a miner has left coal mine employment. Decision and Order at 33. Further finding the opinions of Drs. Caffrey and Gallup in equipoise, he therefore determined Employer failed to rebut the presumption that the Miner's disability was caused by pneumoconiosis. 20 C.F.R. §718.305(d)(1)(ii); Decision and Order at 34.

Employer contends the ALJ erred discrediting Dr. Sargent's opinion on the basis that he did not diagnose clinical pneumoconiosis. Employer's Brief at 17-18. Employer's argument has merit.

Contrary to the ALJ's finding, Dr. Sargent expressly diagnosed simple pneumoconiosis based on the Miner's autopsy findings. Employer's Exhibit 4 at 10. Substantial evidence therefore does not support the ALJ's finding that Dr. Sargent failed to diagnose clinical pneumoconiosis. *See Compton*, 211 F.3d at 207-08; *Lane v. Union Carbide Corp.*, 105 F.2d 166, 174 (4th Cir 1997). As such, Dr. Sargent was not of the

mistaken belief that the Miner did not have the disease, and his opinion on the matter of disability causation may therefore be entitled to weight. *See Hobet Mining, LLC v. Epling*, 783 F.3d 498, 504-05 (4th Cir. 2015). Moreover, while the ALJ found Dr. Caffrey's opinion in equipoise with Dr. Gallup's opinion, which he gave "some weight," Decision and Order at 34, review of the ALJ's decision demonstrates he failed to state what weight he gave Dr. Caffrey's opinion or his reasons for doing so. Thus, the ALJ's decision also fails to comport with the Administrative Procedure Act,[16] 5 U.S.C. §557(c)(3)(A), as incorporated into the Act by 30 U.S.C. §932(a). We must therefore vacate the ALJ's finding that Employer failed to establish rebuttal of the Section 411(c)(4) presumption by establishing that no part of the Miner's respiratory or pulmonary disability is caused by pneumoconiosis. 20 C.F.R. §718.305(d)(1)(ii); Decision and Order at 33.

On remand, because Employer bears the burden of proof on rebuttal, the ALJ must consider the opinions of Drs. Sargent and Caffrey, in their entirety, together with Dr. Gallup's opinion, and determine whether their opinions are sufficient or not to carry Employer's burden to establish that no part of the Miner's disability was caused by pneumoconiosis. *See* 20 C.F.R. §718.305(d)(1)(Ii); *Compton*, 211 F.3d at 211; *Clark v. Karst-Robbins Coal Co.*, 12 BLR 1-149, 1-155 (1989) (en banc). In resolving any conflicts among the medical opinions, the ALJ must explain his findings. *See Hicks*, 138 F.3d at 533; *Lane Hollow Coal Co. v. Director, OWCP* [*Lockhart*], 137 F.3d 799, 803 (4th Cir. 1998); *Minich v. Keystone Coal Mining Corp.*, 25 BLR 1-149, 1-159 (2015); *Wojtowicz v. Duquesne Light Co.*, 12 BLR 1-162, 1-165 (1989); *see also West Virginia CWP Fund v. Bender*, 782 F.3d 129, 143-44 (4th Cir. 2015).

[16] The Administrative Procedure Act, 5 U.S.C. §§500-591, provides that every adjudicatory decision must include "findings and conclusions and the reasons or basis therefor, on all the material issues of fact, law, or discretion presented . . . ." 5 U.S.C. §557(c)(3)(A), as incorporated into the Act by 30 U.S.C. §932(a); *see Wojtowicz v. Duquesne Light Co.*, 12 BLR 1-162, 1-165 (1989).

Accordingly, the ALJ's Decision and Order Awarding Benefits is affirmed in part, vacated in part, and the case is remanded to the ALJ for further consideration consistent with this opinion.

SO ORDERED.

JUDITH S. BOGGS, Chief
Administrative Appeals Judge

DANIEL T. GRESH
Administrative Appeals Judge

MELISSA LIN JONES
Administrative Appeals Judge