U.S. Department of Labor

Benefits Review Board
P.O. Box 37601
Washington, DC 20013-7601

BRB No. 15-0303 BLA

DEAN F. NELSON (on behalf of DEAN R. NELSON)	)	
Claimant-Respondent	)	
v.	)	
JOY MINING MACHINERY	)	DATE ISSUED: 05/26/2016
Employer-Petitioner	)	
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 Scott R. Morris, Administrative Law Judge, United States Department of Labor.

William S. Mattingly (Jackson Kelly PLLC), Lexington, Kentucky, for employer.

MacKenzie Fillow (M. Patricia Smith, Solicitor of Labor; Rae Ellen James, Associate Solicitor; Michael J. Rutledge, Counsel for Administrative Litigation and Legal Advice), Washington, D.C., for the Director, Office of Workers' Compensation Programs, United States Department of Labor.

Before: HALL, Chief Administrative Appeals Judge, GILLIGAN and ROLFE, Administrative Appeals Judges.

PER CURIAM:

Employer appeals the Decision and Order Awarding Benefits (2010-BLA-05429) of Administrative Law Judge Scott R. Morris, rendered on a claim filed on May 5, 2009, pursuant to the provisions of the Black Lung Benefits Act, as amended, 30 U.S.C. §§901-944 (2012) (the Act). The administrative law judge credited the miner[1] with 29.60 years of underground coal mine employment, and determined that he suffered from a totally disabling respiratory or pulmonary impairment pursuant to 20 C.F.R. §718.204(b). Based on these determinations, and the filing date of the claim, the administrative law judge found that claimant invoked the rebuttable presumption of total disability due to pneumoconiosis under Section 411(c)(4) of the Act, 30 U.S.C. §921(c)(4) (2012).[2] The administrative law judge further found that employer did not rebut the presumption. Accordingly, the administrative law judge awarded benefits.

On appeal, employer challenges the administrative law judge's finding regarding the length of the miner's coal mine employment. Employer also contends that the administrative law judge applied an incorrect standard and erred in weighing the medical opinions relevant to rebuttal of the Section 411(c)(4) presumption. The Director, Office of Workers' Compensation Programs (the Director), responds, urging affirmance of the administrative law judge's award of benefits.[3]

The Board's scope of review is defined by statute. The administrative law judge's Decision and Order must be affirmed if it is rational, supported by substantial evidence, and in accordance with applicable law.[4] 33 U.S.C. §921(b)(3), as incorporated by 30

[1] While this case was pending before the Office of Administrative Law Judges, the miner died on March 9, 2014. Employer's Exhibit 6. Claimant is Dean F. Nelson, the miner's father, who is pursuing the claim on behalf of the miner's estate. Decision and Order Awarding Benefits at 2 n.5; Claimant's Exhibit 1.

[2] Under Section 411(c)(4), claimant is entitled to a rebuttable presumption that the miner was totally disabled due to pneumoconiosis where the record establishes at least fifteen years of underground coal mine employment and a totally disabling respiratory or pulmonary impairment. 30 U.S.C. §921(c)(4) (2012), as implemented by 20 C.F.R. §718.305.

[3] We affirm, as unchallenged on appeal, the administrative law judge's finding that the miner was totally disabled pursuant to 20 C.F.R. §718.204(b)(2). *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710, 1-711 (1983); Decision and Order at 9-17.

[4] Because the miner's last coal mine employment was in West Virginia, the Board will apply the law of the United States Court of Appeals for the Fourth Circuit. *See*

U.S.C. §932(a); *O'Keeffe v. Smith, Hinchman & Grylls Associates, Inc.*, 380 U.S. 359 (1965)

I. Invocation of the Section 411(c)(4) Presumption - Length of Coal Mine Employment

Claimant bears the burden of proof in establishing the length of the miner's coal mine employment. *Mills v. Director, OWCP*, 348 F.3d 133, 136, 23 BLR 2-12, 2-16 (6th Cir. 2003); *Kephart v. Director, OWCP*, 8 BLR 1-185, 1-186 (1985). The administrative law judge is given great latitude in the computation of years of coal mine employment and, as such, his calculation of years of coal mine work will be upheld, when based on a reasonable method of computation and supported by substantial evidence in the record considered as a whole. *Hunt v. Director, OWCP*, 7 BLR 1-709, 1-710-711 (1985); *Shelesky v. Director, OWCP*, 7 BLR 1-34 (1984); *Caldrone v. Director, OWCP*, 6 BLR 1-575, 1-578 (1983).

In this case, the itemized statement of earnings from the Social Security Administration (SSA) shows *quarterly* earnings for the miner with Heritage Coal Company during 1975-1977, American Coal Company during 1977-1979, and Emery Mining Corporation during 1977-1978. Director's Exhibit 6. The SSA records also listed *annual* earnings with employer for the years from 1979-2008. *Id*. The administrative law judge stated that he was unable to determine the beginning and ending dates of the miner's employment and that he would, therefore, apply the formula set forth at 20 C.F.R. §725.101(a)(32)(iii).[5] Decision and Order at 6. Based on his comparison of claimant's annual wage to the industry average, the administrative law judge credited the miner with 3.25 years of underground coal mine employment for his employment with Heritage Coal Company, American Coal Company, and Emery Mining Corporation from 1975 to 1978. *Id*. at 6-7.

Shupe v. Director, OWCP, 12 BLR 1-200, 1-202 (1989) (en banc); Decision and Order at 4 n. 8; Employer's Exhibit 9 at 12.

[5] The regulation at 20 C.F.R. §725.101(a)(32)(iii) provides that, "[i]f the evidence is insufficient to establish the beginning and ending dates of the miner's coal mine employment, or the miner's employment lasted less than a calendar year, the adjudication officer may use the following formula: divide the miner's yearly income from work as a by miner by the coal mine industry's average daily earnings for that year, as reported by the Bureau of Labor Statistics." 20 C.F.R. §725.101(a)(32)(iii).

The administrative law judge credited the miner with 12 years of coal mine employment with employer from 1979 to 1991, and 13.35 years from 1995 to 2008. Decision and Order at 7-8. The administrative law judge noted that, while the miner had annual earnings with employer in 1992 and 1994, the miner specifically testified during a deposition conducted on September 9, 2009, that he worked for employer in Canada during that timeframe. *Id*. at 7. The administrative law judge observed that under 20 C.F.R. §725.101(a)(32)(iv), "[p]eriods of coal mine employment occurring outside the United States must not be considered in computing the miner's work history." Decision and Order at 4 n. 9. The administrative law judge also noted that claimant had no income reported for 1993. Although the administrative law judge did not count the years of 1992-1994 in calculating the length of the miner's coal mine employment, he stated that he was unable to quantify any [further] reduction in the [m]iner's qualifying coal mine employment."[6] *Id*. at 7 n.13.

Addressing the miner's deposition testimony, the administrative law judge noted that the miner "testified that [eighty-percent] of his work was servicing mining equipment in coal mines" and that "[ninety-five] percent of his working day was spent underground." Decision and Order at 8, *citing* Employer's Exhibit 9 at 7-8. In addition, the administrative law judge noted that the miner testified that from 1979 to 2008, "probably half the time, probably [fifteen] years was working in coal mines for [employer] in Utah, Wyoming and Colorado." Decision and Order at 8, *quoting* Employer's Exhibit 9 at 11. The administrative law judge found that the miner's "statements about the location of his employment are unrebutted." Decision and Order at 8. The administrative law judge concluded, based on his review of the SSA records, and the miner's deposition testimony, and his "own generalized knowledge of coal mine operations obtained as an administrative law judge adjudicating Black Lung Act claims," that claimant established "29.60 years of qualifying coal mine employment for the period of 1975 through 2008." *Id*. at 9.

Employer argues that the administrative law judge erred in failing to make a more specific determination as to how much of claimant's work was performed outside of the

[6] The miner testified in his deposition on September 9, 2009 that he worked for employer in Utah as a field service representative from 1982 to 1992, and as a senior service engineer in Colorado from 1994 to 2003, and as a senior service engineer in Arizona from 2003 to 2008. Employer's Exhibit 9 at 5-7. He explained that he would install mining equipment and train miners to use the equipment. *Id*. at 7. He travelled frequently to various mine sites for employer in the United States and all over the world. *Id*. His work was primarily underground and the coal was being produced about fifty to sixty percent of the time he was at the mine. *Id*. at 8-9.

United States.[7] Employer contends that the miner's testimony establishes that he frequently traveled to foreign countries to work on coal mines as part of his duties with employer, and that the administrative law judge failed to require claimant to establish the exact length of his coal mine employment in the United States. In addition, employer notes that the miner testified that he spent the first two to two and one-half years working for employer as an electrician, and that the administrative law judge did not determine if that work as an electrician "was in or around a coal mine site[.]" Employer's Brief in Support of Petition for Review at 11; *see* Employer's Exhibit 9 at 5.

Absent from employer's brief in this case is any allegation that claimant worked less than the fifteen years in underground coal mine employment in the United States necessary for invocation of the Section 411(c)(4) presumption. The Director notes correctly that employer does not dispute[8] the administrative law judge's finding that the miner's *unrebutted* testimony establishes that he worked for at least fifteen years for employer in underground coal mines from 1979 to 2008, in the states of Utah, Wyoming and Colorado. Director's Letter Brief at 3. Employer also does not challenge the administrative law judge's application of the formula at §725.101(a)(32) to credit the miner with 3.25 years of underground coal mine employment with Heritage Coal Company, American Coal Company, and Emery Mining Corporation from 1975 to 1978. We agree with the Director that, even if we exclude the time identified by employer in its brief,[9] the record establishes at least 18.25 years of underground coal mine employment in the United States. Thus, employer has failed to properly explain why it is necessary to remand this case for further consideration. *See Shinseki v. Sanders*, 556 U.S. 396, 413 (2009) (appellant must explain how the "error to which [it] points could have made any

[7] We affirm, as unchallenged by employer on appeal, the administrative law judge's finding that all of the miner's coal mine employment was in underground coal mines. *See Skrack*, 6 BLR at 1-711; Decision and Order at 8-9.

[8] Employer concedes that "[a]bout half of [the miner's] work for [Joy Manufacturing Company/Joy Technologies(Joy)] occurred in the states of Utah, Wyoming, or Colorado, or about [fifteen] years of his working experience." Employer's Brief in Support of Petition for Review at 12.

[9] Employer states, "[o]f his work for [employer], at least two years must be excluded for work in Nova Scotia, Canada (as not in the Nation's coal mines), as well as the 20 [percent] of the time with employer (or about 6 years of the time between 1979 and 2008) as [claimant] worked in non-coal mining operations." Employer's Brief in Support of Petition for Review at 13.

difference."); *Larioni v. Director, OWCP*, 6 BLR 1-1276 (1984). We therefore affirm, as supported by substantial evidence, the administrative law judge's determinations that the miner worked at least fifteen years in underground coal mine employment and that claimant invoked the rebuttable presumption of total disability due to pneumoconiosis under Section 411(c)(4). *See Muncy v. Elkay Mining Co.*, 25 BLR 1-21, 1-27-28 (2011).

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

In order to rebut the Section 411(c)(4) presumption, employer must affirmatively establish that the miner had neither legal[10] nor clinical[11] pneumoconiosis, or that "no part of the miner's disabling respiratory or pulmonary impairment was caused by pneumoconiosis as defined in § 718.201." 20 C.F.R. §718.305(d)(1)(i), (ii); *see W. Va. CWP Fund v. Bender*, 782 F.3d 129, 137 (4th Cir. 2015); *Minich v. Keystone Coal Mining Co.*, 25 BLR 1-149, 154-56 (2015) (Boggs, J., concurring and dissenting). The administrative law judge determined that employer disproved the existence of clinical pneumoconiosis by a preponderance of the x-ray and medical opinion evidence. Decision and Order at 21-22, 24. In considering whether employer disproved the existence of legal pneumoconiosis, the administrative law judge rejected the opinions of employer's physicians, Drs. Farney and Castle, who opined that the miner suffered from an obstructive respiratory impairment due solely to smoking.[12] *Id.* at 24-27. The

[10] Legal pneumoconiosis is defined as "any chronic lung disease or impairment and its sequelae arising out of coal mine employment. This definition includes, but is not limited to, any chronic restrictive or obstructive pulmonary disease arising out of coal mine employment." 20 C.F.R. §718.201(a)(2). The regulation also provides that "a disease 'arising out of coal mine employment' 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).

[11] 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. This definition includes, but is not limited to, coal workers' pneumoconiosis, anthracosilicosis, anthracosis, anthrosilicosis, massive pulmonary fibrosis, silicosis or silicotuberculosis, arising out of coal mine employment." 20 C.F.R. §718.201(a)(1).

[12] In addition, the administrative law judge found that Dr. Gagon's opinion diagnosing legal pneumoconiosis was internally inconsistent and entitled to "less weight." Decision and Order at 23-24.

administrative law judge specifically found that Drs. Farney and Castle expressed views that are contrary to the preamble to the revised 2001 regulations and the definition of legal pneumoconiosis. *Id.* The administrative law judge further found that neither physician adequately explained why the miner's respiratory condition was not significantly related to, or substantially aggravated by, coal dust exposure. *Id.*

Employer asserts that the administrative law judge applied too "high of a standard in assessing the presence of legal pneumoconiosis," requiring its physicians to explain why "there is absolutely no contribution by coal dust exposure to pulmonary impairment." Employer's Brief in Support of Petition for Review at 17. Employer argues that the administrative law judge "confuses a legal presumption of total disability due to pneumoconiosis with the definition of legal pneumoconiosis." *Id.* at 17-18. Therefore employer maintains that this case must be remanded for application of the correct rebuttal standard. We disagree.

Prior to his analysis of the medical evidence, the administrative law judge correctly stated that "rebuttal required an affirmative showing that the [m]iner either: (1) did not have pneumoconiosis, or (2) that no part of the [m]iner's respiratory or pulmonary disability was caused by pneumoconiosis." Decision and Order at 18; *see* 20 C.F.R. §718.305(d)(1). The administrative law judge specifically stated that, in order to rebut the presumption of legal pneumoconiosis, employer must establish that "[the miner's] impairment was not 'significantly related to, or substantially aggravated by[,] dust exposure in coal mine employment[.]'" Decision and Order at 24, *quoting* 20 C.F.R. §718.201(b). Moreover, the administrative law judge did not reject the opinions of Drs. Farney and Castle for being insufficient to meet a "rule out" standard. Decision and Order at 24-27. Rather, he found that their specific explanations for why they excluded the existence of legal pneumoconiosis were not credible. *Id.* Thus, we reject employer's assertion that the case must be remanded for consideration under the proper rebuttal standard. *Minich*, 25 BLR at 1-154-56.

With respect to the administrative law judge's specific credibility findings, we reject employer's contention that the administrative law judge substituted his opinion for that of the medical experts, when weighing the opinions of Drs. Farney and Castle. The administrative law judge accurately noted that Dr. Farney opined that a diagnosis of legal pneumoconiosis "cannot be supported" based on the following reasoning:

> When [chronic obstructive pulmonary disease (COPD)] is caused by coal dust exposure, there is invariably evidence of associated fibrotic disease which reflects the presence of heavy retained dust burden with secondary pulmonary reaction. . . . [T]here was no radiographic evidence to support COPD associated with fibrotic lung disease.

Director's Exhibit 32; *see* Decision and Order at 24. Contrary to employer's argument, the administrative law judge rationally found Dr. Farney's explanation to be unpersuasive because "by definition, legal pneumoconiosis does not [require] radiographic evidence of fibrotic lung disease[,]" and "[e]ven in the absence of findings of clinical pneumoconiosis, *i.e.* x-ray correlation of the disease, coal dust exposure can produce a disabling chronic obstructive lung disease." Decision and Order at 24; *see Harman Mining Co. v. Director, OWCP* [*Looney*], 678 F.3d 305, 314-16, 25 BLR 2-115, 2-129-32 (4th Cir. 2012); *Lewis Coal Co. v. Director, OWCP* [*McCoy*], 373 F.3d 570, 578, 23 BLR 2-184, 2-190 (4th Cir. 2004).

In addition, the administrative law judge correctly observed that Dr. Farney "acknowledged that the [m]iner had sufficient coal dust exposure to develop coal workers' pneumoconiosis," but he excluded a diagnosis of legal pneumoconiosis because "the [m]iner's pulmonary disease 'can be entirely explained' by the [m]iner's smoking history." Decision and Order at 15, 24, *quoting* Director's Exhibit 32; *see* Employer's Exhibit 4. The administrative law judge permissibly rejected Dr. Farney's opinion, finding that the physician "never explained, especially given the years this [m]iner spent in the mines, why [the miner's] impairment was not 'significantly related to, or substantially aggravated by dust exposure in coal mine employment,' as [this] is the presumption that [employer] must rebut." Decision and Order at 24-25, *quoting* 20 C.F.R. §718.201(b); *see Hobet Mining, LLC v. Epling*, 783 F.3d 498 (4th Cir. 2015); *Milburn Colliery Co. v. Hicks*, 138 F.3d 524, 533, 21 BLR 2-323, 2-335 (4th Cir. 1998); *Sterling Smokeless Coal Co. v. Akers*, 131 F.3d 438, 441, 21 BLR 2-269, 2-275-76 (4th Cir. 1997).

In considering Dr. Castle's opinion, the administrative law judge noted correctly that he attributed the miner's "moderately severe to severe degree of airway obstruction" entirely to smoking with no contribution from coal dust exposure. Employer's Exhibit 7; *see* Decision and Order at 16, 25. Dr. Castle based his opinion, in part, on the fact that "coal workers' pneumoconiosis does not typically cause a severe reduction in the FEV_1/FVC ratio, but rather reflects a relative preservation or minimal reduction in this ratio."[13] Employer's Exhibit 7. Contrary to employer's arguments, the administrative

[13] The administrative law judge rationally found that, even if coal workers' pneumoconiosis does not "typically" cause a reduction in the FEV_1/FVC ratio, Dr. Castle "did not explain why [the miner] could not be one of the unlikely or rare cases of coal miners who contract pneumoconiosis." Decision and Order at 26; *Harman Mining Co. v. Director, OWCP* [*Looney*], 678 F.3d 305, 314-16, 25 BLR 2-115, 2-129-32 (4th Cir. 2012); *Milburn Colliery Co. v. Hicks*, 138 F.3d 524, 533, 21 BLR 2-323, 2-335 (4th Cir. 1998); *Sterling Smokeless Coal Co. v. Akers*, 131 F.3d 438, 441, 21 BLR 2-269, 2-275-76 (4th Cir. 1997).

law judge reasonably found that Dr. Castle's views are inconsistent with the science credited by the Department of Labor in the preamble that coal mine dust exposure may result in a decreased FEV_1/FVC ratio.[14] *See* 65 Fed. Reg. 79,920, 79,943 (Dec. 20, 2000); *Westmoreland Coal Co. v. Cochran*, 718 F.3d 319, 324, 25 BLR 2-255, 2-265 (4th Cir. 2013); *Looney*, 678 F.3d at 313, 25 BLR at 2-129-30; Decision and Order at 25-27. Moreover, to the extent that Dr. Castle stated that the miner's "coal mine dust exposure history was sufficient enough to have possibly caused him to develop coal workers' pneumoconiosis," Employer's Exhibit 7, the administrative law judge permissibly found that Dr. Castle "did not sufficiently explain how he could discount any meaningful contribution by coal dust exposure" in the miner's obstructive respiratory impairment.[15] Decision and Order at 25, 27; *see Epling*, 783 F.3d at 498; *Hicks*, 138 F.3d at 533, 21 BLR at 2-335; *Akers*, 131 F.3d at 441, 21 BLR at 2-275-76.

As the trier-of-fact, the administrative law judge has discretion to assess the credibility of the medical opinions,[16] based on the explanations given by the experts for

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[14] The Department of Labor stated the following:

> In addition to the risk of simple [coal workers' pneumoconiosis] and [progressive massive fibrosis], epidemiological studies have shown that *coal miners have an increased risk of developing* [*Chronic Obstructive Pulmonary Disease (COPD)*]. *COPD may be detected from decrements in certain measures of lung function, especially FEV_1 and the ratio of FEV_1/FVC.* Decrements in lung function *associated with exposure to coal mine dust are severe enough to be disabling in some miners*, whether or not pneumoconiosis is also present.

65 Fed. Reg. 79,920, 79,943 (Dec. 20 , 2000) (emphasis added).

[15] The administrative law judge noted that Dr. Castle diagnosed mild to moderate hypoxemia, based on the arterial blood gas study results, and that he attributes the impairment to smoking, rather than coal dust exposure. Decision and Order at 26; Employer's Exhibit 7. The administrative law judge permissibly discounted Dr. Castle's opinion because he "never explained how he was able to exclude the [m]iner's coal mine dust exposure from contributing to these arterial blood gas study results" and he "makes a conclusory statement that they are entirely the result of the [m]iner's smoking." Decision and Order at 26; *see Hicks*, 138 F.3d at 533, 21 BLR at 2-335; *Akers*, 131 F.3d at 441, 21 BLR at 2-275-76.

[16] Employer contends that the administrative law judge fails to explain the weight he gave to the treatment records or address "if they support the other medical opinions." Employer's Brief in Support of Petition for Review at 4 n. 4. However, because the

their diagnoses, and assign those opinions appropriate weight. *See Cochran*, 718 F.3d at 323, 2-264-65; *Looney*, 678 F.3d at 315-16, 25 BLR at 2-130. The Board cannot reweigh the evidence or substitute its inferences for those of the administrative law judge. *Anderson v. Valley Camp of Utah, Inc.*, 12 BLR 1-111, 1-113 (1989); *Fagg v. Amax Coal Co.*, 12 BLR 1-77 (1988). Because it is supported by substantial evidence, we affirm the administrative law judge's finding that employer failed to establish that the miner did not have legal pneumoconiosis and is unable to rebut the Section 411(c)(4) presumption pursuant to 20 C.F.R. §718.305(d)(1)(i).[17]

With regard to the presumed fact of disability causation, the administrative law judge rationally found that the opinions of Drs. Farney and Castle are not credible to

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treatment records do not address the cause of the miner's obstructive respiratory impairment, and do not assist employer in satisfying its burden to rebut the presumption of legal pneumoconiosis, we consider the administrative law judge's error to be harmless. *See* 20 C.F.R. §718.305(d)(1)(i)(A); *W. Va. CWP Fund v. Bender*, 782 F.3d 129, 137 (4th Cir. 2015); Director's Exhibit 32; Employer's Exhibits 1, 6.

[17] Employer argues that the administrative law judge "made the rebuttable presumption irrebuttable" by finding that the opinions of Drs. Farney and Castle are inconsistent with the preamble because they stated that they could distinguish between obstructive respiratory impairment due to smoking and obstructive respiratory impairment due to coal dust exposure. Employer's Brief in Support of Petition for Review at 20-23, 25; *see* Decision and Order at 24, 26. Since the administrative law judge provided valid reasons for rejecting the opinions of Drs. Farney and Castle on the issue of legal pneumoconiosis, it is not necessary that we address employer's alternate argument. *See Larioni v. Director, OWCP*, 6 BLR 1-1276, 1-278 (1984); *Kozele v. Rochester and Pittsburgh Coal Co.*, 6 BLR 1-378, 1-382 n.4 (1983).

establish that no part of the miner's total respiratory or pulmonary disability was due to legal pneumoconiosis, as neither physician diagnosed the disease. *See Scott v. Mason Coal Co.*, 289 F.3d 263, 22 BLR 2-372 (4th Cir. 2002); *Toler v. Eastern Associated Coal Corp.*, 43 F.3d 109, 19 BLR 2-70 (4th Cir. 1995); Decision and Order at 29. We therefore affirm, as supported by substantial evidence, the administrative law judge's finding that employer failed to rebut the Section 411(c)(4) presumption under 20 C.F.R. §718.305(d)(1)(ii). *See Bender*, 782 F.3d at 137.

Accordingly, the administrative law judge's Decision and Order Awarding Benefits is affirmed.

SO ORDERED.

BETTY JEAN HALL, Chief
Administrative Appeals Judge

RYAN GILLIGAN
Administrative Appeals Judge

JONATHAN ROLFE
Administrative Appeals Judge