U.S. Department of Labor

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

BRB No. 17-0024 BLA

JOHN R. QUINN (deceased)	)	
	)	
Claimant-Petitioner	)	
	)	
v.	)	
	)	
MID-VALLEY CONTRACTING SERVICE	)	
	)	DATE ISSUED: 10/24/2017
Employer-Respondent	)	
	)	
DIRECTOR, OFFICE OF WORKERS' COMPENSATION PROGRAMS, UNITED STATES DEPARTMENT OF LABOR	)	
	)	
Party-in-Interest	)	DECISION and ORDER

Appeal of the Decision and Order Denying Benefits of Adele Higgins Odegard, Administrative Law Judge, United States Department of Labor.

John A. Bednarz, Jr., Wilkes-Barre, Pennsylvania, for claimant.

Joel M. Wolff and Patrick R. Casey (Elliott, Greenleaf & Dean), Scranton, Pennsylvania, for employer.

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

PER CURIAM:

Claimant[1] appeals the Decision and Order Denying Benefits (2013-BLA-05679) of Administrative Law Judge Adele Higgins Odegard rendered on a miner's claim filed on December 2, 2011, 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 with eight years and seven months of coal mine employment.[2] Because the miner had less than fifteen years of coal mine employment, the administrative law judge found that claimant was unable to invoke the rebuttable presumption of total disability due to pneumoconiosis pursuant to Section 411(c)(4) of the Act.[3] 30 U.S.C. §921(c)(4) (2012). The administrative law judge further found that the evidence established the existence of clinical pneumoconiosis, but not legal pneumoconiosis, pursuant to 20 C.F.R. §718.202(a), that the miner's clinical pneumoconiosis arose out of his coal mine employment pursuant to 20 C.F.R. 718.203(c), and that the miner was totally disabled pursuant to 20 C.F.R. §718.204(b)(2). However, the administrative law judge found that the evidence failed to establish that the miner's total disability was due to pneumoconiosis pursuant to 20 C.F.R. §718.204(c). Accordingly, the administrative law judge denied benefits.[4]

On appeal, claimant argues that the administrative law judge erred in finding that the evidence did not establish at least fifteen years of coal mine employment and, therefore, erred in determining that claimant did not invoke the Section 411(c)(4) presumption. Claimant further contends that the administrative law judge erred in finding that claimant failed to establish legal pneumoconiosis pursuant to 20 C.F.R.

[1] The miner died on October 16, 2014, while his claim was pending before the administrative law judge. Employer's Exhibit 4; Claimant's Exhibit 12. Claimant is the miner's widow, who is pursuing the claim on his behalf. Decision and Order at 3.

[2] The record reflects that the miner's last coal mine employment was in Pennsylvania. Director's Exhibit 8. Accordingly, the Board will apply the law of the United States Court of Appeals for the Third Circuit. *See Shupe v. Director, OWCP*, 12 BLR 1-200, 1-202 (1989) (en banc).

[3] Section 411(c)(4) of the Act provides a rebuttable presumption that a miner is totally disabled due to pneumoconiosis in cases where the miner has fifteen or more years of qualifying coal mine employment and a totally disabling respiratory impairment. 30 U.S.C. §921(c)(4) (2012); *see* 20 C.F.R. §718.305.

[4] In an order issued on September 21, 2016, the administrative law judge denied claimant's request for reconsideration, finding that, contrary to claimant's contention, she had received and considered claimant's brief before denying benefits.

§718.202(a), and total disability due to pneumoconiosis pursuant to 20 C.F.R. §718.204(c). Employer responds, urging affirmance of the denial of benefits. The Director, Office of Workers' Compensation Programs, declined to file a response.

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. 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).

Length of Coal Mine Employment

Claimant bears the burden of proof to establish the number of years the miner worked in coal mine employment. *Kephart v. Director, OWCP*, 8 BLR 1-185, 1-186 (1985). As the regulations provide only limited guidance for the computation of time spent in coal mine employment, the Board will uphold the administrative law judge's determination if it is based on a reasonable method and supported by substantial evidence. *See Muncy v. Elkay Mining Co.*, 25 BLR 1-21, 1-27 (2011); *Dawson v. Old Ben Coal Co.*, 11 BLR 1-58, 1-60 (1988) (en banc).

In addressing the length of the miner's coal mine employment, the administrative law judge considered the miner's employment history form, his Social Security Administration (SSA) earnings records, and his responses to two requests from the district director for information about the coal mine employment he performed for Mid-Valley Contracting Services. Decision and Order at 12-13; Director's Exhibits 3, 5, 6, 8. The administrative law judge also considered information provided in April 2012 by James Snodgrass, vice-president of employer, about the dates and nature of the miner's employment with the company, and a subsequent letter from Mr. Snodgrass dated June 26, 2012. Decision and Order at 13; Director's Exhibits 7, 27.

The administrative law judge credited the miner with "at most two years" of coal mine employment for Bethlehem Steel, relying on SSA earnings records showing that the miner worked for the company for a total of eight quarters from 1967 to 1974. Decision and Order at 13; Director's Exhibit 8. After determining that Mr. Snodgrass's June 2012 letter provided the most accurate information about the miner's work for employer, the administrative law judge credited the miner with a total of six years and seven months of coal mine employment with employer, from two stints of work at the site of the Hazleton Shaft Corporation, first to build a coal plant and then to maintain it.[5] Decision and Order

[5] Mr. Snodgrass explained during his testimony at the hearing (which the administrative law judge did not cite when she made her finding regarding the length of

at 13. The administrative law judge therefore found that the miner had a total of eight years and seven months of coal mine employment. *Id.* Consequently, the administrative law judge found that the miner could not invoke the Section 411(c)(4) presumption. *Id.* at 14.

Claimant contends that the administrative law judge erred in finding less than fifteen years of coal mine employment, and asserts that she should have found sixteen years established. Claimant's Brief at 14-16. As an initial matter, claimant argues that the administrative law judge erred by admitting into evidence Mr. Snodgrass's June 2012 letter, as well as a May 2013 letter from Kevin J. McHugh, the business manager of the ironworkers union whose jurisdiction included Hazleton Shaft Corporation, because employer did not timely submit the letters. *Id.* at 16-19; Director's Exhibit 27; Employer's Motion for Summary Judgment, Exhibit D. Claimant asserts that the administrative law judge was required to exclude both letters because they were not submitted to the district director and the administrative law judge did not find "extraordinary circumstances" for their admission pursuant to 20 C.F.R. §725.456(b)(1). Claimant's Brief at 14-22.

Claimant's argument lacks merit. Section 725.456(b)(1) applies to "[d]ocumentary evidence pertaining to the liability of a potentially liable operator and/or the identification of a responsible operator which was not submitted to the district director[.]" 20 C.F.R. §725.456(b)(1). Contrary to claimant's contention, it does not apply to Mr. Snodgrass's June 2012 letter, which pertains to an issue related to claimant's entitlement. Moreover, the letter was timely, because employer submitted it to the district director, who received it on July 2, 2012. Director's Exhibit 27. As for Mr. McHugh's letter, it stated only that the miner worked at Hazleton Shaft Corporation "from approximately 2005 thru [*sic*] his retirement in 2010," and noted that the miner performed "ironworker duties" above ground at the job site. Employer's Motion for Summary Judgment, Exhibit D. The administrative law judge admitted the letter for the limited purpose of determining whether Mr. Quinn was a miner, and ultimately concluded that she could not consider it in determining whether employer was the responsible operator.[6] Thus, to the extent 20 C.F.R. §725.456(b)(1) applies to Mr.

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the miner's coal mine employment) that the miner worked for employer on a variety of projects at different sites, primarily as a journeyman ironworker. Hearing Transcript (Sept. 19, 2014) at 51-54.

[6] The administrative law judge noted at the hearing on September 19, 2014, that she was only "conditionally" admitting Mr. McHugh's letter, along with the other exhibits attached to employer's motion for summary judgment, on the issue of whether

McHugh's letter, the administrative law judge did not abuse her discretion in admitting it. *See Clark v. Karst-Robbins Coal Co.*, 12 BLR 1-149, 1-153 (1989) (en banc).

Next, claimant argues that the administrative law judge erred by disregarding the employment information Mr. Snodgrass provided to the district director in April 2012, and that the administrative law judge failed to explain why she credited Mr. Snodgrass's June 2012 letter over his earlier submission. Claimant's Brief at 14-15. Claimant argues that Mr. Snodgrass's April 2012 submission and the miner's SSA earnings records combine to establish that the miner had fourteen years of coal mine employment with employer, and that when the miner's two years of work for Bethlehem Steel are included, he has sixteen years of coal mine employment. Id. at 15-16. We disagree.

Mr. Snodgrass's April 2012 submission, provided in response to a request from the district director, stated that the miner worked for employer from 1995 to 2001, and from 2004 to 2010. Director's Exhibit 7. The submission described the miner's duties during both periods: "erect structural steel, rigging, machinery maintenance on various jobs[.]" *Id*. The submission also listed the miner's specific duties at the Hazleton Shaft Corporation — erecting a coal processing facility and crusher plant, installing equipment and conveyor piping, and maintaining equipment — and noted that he worked at other sites as well during his dates of employment with employer. *Id*.

In his June 2012 letter, Mr. Snodgrass stated that employer's employment records go back only to 1998. Director's Exhibit 27. The letter indicated that the miner worked for employer from January 23, 1998, to January 1, 2001; from May 14, 2001, to December 10, 2001; and from October 19, 2004, to October 8, 2010. *Id*. It also indicated that the miner did not work for employer in 2002 or 2003. *Id*. Finally, the letter provided specific dates during which the miner worked at the Hazleton Shaft Corporation, stating that he worked there from the week ending September 27, 1998, through the week ending November 21, 1999, and again from April 25, 2005, to October 8, 2010. *Id*.

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employer was the responsible operator. Hearing Transcript (Sept. 19, 2014) at 30-34. The administrative law judge subsequently determined, in a separate order finding that employer is the responsible operator, that employer failed to establish "extraordinary circumstances" pursuant to 20 C.F.R. §725.456(b)(1), and thus did not consider Mr. McHugh's letter and the other attached exhibits in resolving that issue. July 15, 2015 Decision and Order at 5-6; *see* Decision and Order at 3 n.5.

The administrative law judge noted that the two submissions from Mr. Snodgrass offered contradictory dates on the miner's work, and she found the record "unclear" as to the precise date when the miner began working at the Hazleton Shaft Corporation. Decision and Order at 13. However, she determined that the record clearly established that the miner worked at the Hazleton Shaft Corporation during two periods — first in building a coal plant, and then in maintaining it. *Id*. The administrative law judge determined that Mr. Snodgrass's June 2012 letter provided the most accurate information on those two periods, because employer "would have the most complete information on the employment dates of its employees." *Id*. Therefore, crediting that letter, the administrative law judge found that the miner worked at the Hazleton Shaft Corporation site from September 1998 to November 1999, and from April 2005 to October 2010, for a total of six years and seven months of coal mine employment with employer.[7] *Id*.

The administrative law judge pointed out that claimant bore the burden of establishing the length of the miner's coal mine employment, and found that claimant failed to establish that the miner worked at the Hazleton Shaft Corporation before 1998, or in the period between 2000 and April 2005. Decision and Order at 13. Furthermore, the administrative law judge determined that claimant "has not provided any evidence" to substantiate the miner's claim on his employment history form that he worked in coal mine construction from 1970 to 2010. *Id*. at 14. Nor did claimant provide any evidence that the miner worked around a coal mine or in coal preparation for any of the companies listed in his SSA earnings records from 1967 to 2010, other than Bethlehem Steel and employer. *Id*. The administrative law judge therefore determined that claimant failed to establish any other coal mine employment, and credited the miner with a total of eight years and seven months of coal mine employment. *Id*. at 13-14.

The administrative law judge did not err in weighing the evidence. Contrary to claimant's contention, she did not disregard the April 2012 submission from Mr. Snodgrass, but instead noted that it and Mr. Snodgrass's June 2012 letter provided different dates for the miner's work for employer. Decision and Order at 13. The April 2012 submission, however, contains no information regarding the dates of the miner's work for employer at the Hazleton Shaft Corporation. Director's Exhibit 7. As the administrative law judge noted, claimant did not argue that the miner performed coal mine employment during any of his work for employer on other sites and projects. Decision and Order at 14. Thus, the administrative law judge reasonably gave more

[7] The administrative law judge determined that Mr. McHugh's letter was consistent with Mr. Snodgrass's June 2012 letter and thus lent support to employer's position regarding the length of the miner's employment, but was not dispositive because the miner may have also worked for other unions. Decision and Order at 13 & n.10.

weight to Mr. Snodgrass's June 2012 letter in determining when the miner worked at the Hazleton Shaft Corporation, and explained that she credited it because it was based on employer's records.[8] *See Mancia v. Director, OWCP*, 130 F.3d 579, 584, 21 BLR 2-215, 2-234 (3d Cir. 1997); *Vickery v. Director, OWCP*, 8 BLR 1-430, 1-432 (1986).

Claimant also argues generally that the evidence, when viewed as a whole, establishes that the miner had at least fifteen years of coal mine employment. Claimant's Brief at 47-48. This argument lacks merit. To the extent claimant is asking the Board to reweigh the evidence, we are not authorized to do so. *Anderson v. Valley Camp of Utah, Inc.*, 12 BLR 1-111, 1-113 (1989). Furthermore, although claimant lists evidence to which the administrative law judge did not refer when she determined the length of the miner's coal mine employment, the administrative law judge's failure to consider that evidence was at worst harmless error, because claimant has not explained how any of it could produce a different result by supporting a finding of at least fifteen years of coal mine employment.[9] *See Shinseki v. Sanders*, 556 U.S. 396, 413 (2009) (dismissing error as harmless when appellant fails to explain how "error to which he points could have made any difference").

Therefore, we affirm the administrative law judge's finding that the miner had eight years and seven months of coal mine employment.[10] Consequently, we also affirm

[8] Even if the miner performed coal mine employment for employer from 1995 (the year he began working for employer, according to Mr. Snodgrass's April 2012 submission) through January of 1998 (the first year of employer's records, according to Mr. Snodgrass's June 2012 letter), he could be credited at most with just over three additional years of coal mine employment. Director's Exhibits 7, 27. That addition would not give the miner the fifteen years of coal mine employment necessary to invoke the Section 411(c)(4) presumption.

[9] In addition to Director's Exhibits 3-8, claimant cites her own hearing testimony; affidavits from Robert Quinn and Donald Fisher, former co-workers of the miner's at the Hazleton Shaft Corporation; and hearing testimony from Mr. Snodgrass and Paul Achenbach, an ironworker and the miner's foreman at the Hazleton Shaft Corporation. Claimant's Brief at 47; Claimant's Exhibits 1, 2; Hearing Transcript (Sept. 19, 2014); Hearing Transcript (February 27, 2015). Our review of this evidence reveals nothing that could make a substantive difference in the administrative law judge's finding.

[10] Claimant also seems to suggest that the district director's decision to credit the miner with 26.5 years of coal mine employment should receive some deference, or that the "vast difference" between the district director's finding and the administrative law judge's finding "merits further evaluation" on remand. Claimant's Brief at 9-14, 46-48.

the administrative law judge's determination that claimant could not invoke the Section 411(c)(4) presumption.

Merits of Entitlement Under 20 C.F.R. Part 718

To be entitled to benefits under the Act without the benefit of a presumption, claimant must establish the existence of pneumoconiosis, that the pneumoconiosis arose out of coal mine employment, a totally disabling respiratory or pulmonary impairment, and that the totally disabling respiratory or pulmonary impairment is due to pneumoconiosis. 30 U.S.C. §901; 20 C.F.R. §§718.3, 718.202, 718.203, 718.204. Failure to establish any one of these elements precludes an award of benefits. *Anderson*, 12 BLR at 1-112; *Trent v. Director, OWCP*, 11 BLR 1-26, 1-27 (1987); *Perry v. Director, OWCP*, 9 BLR 1-1 (1986) (en banc).

Claimant first argues that the administrative law judge erred in finding that the medical opinion evidence did not establish the existence of legal pneumoconiosis.[11] Claimant's Brief at 31-53. In addressing the issue, the administrative law judge considered the opinions of Drs. Rothfleisch and Colella. Decision and Order at 21-22. In an initial report dated February 1, 2012, Dr. Rothfleisch diagnosed the miner with severe chronic obstructive pulmonary disease (COPD) due solely to tobacco use. Director's

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This argument lacks merit. When a party requests a formal hearing after a district director's proposed decision, an administrative law judge proceeds *de novo* and is not bound by the district director's findings. *See* 20 C.F.R. §725.455(a). Finally, to the extent claimant contends that the administrative law judge erred by not determining whether each of the employers listed in the miner's Social Security Administration earnings records was involved in coal mining, and that remand is warranted because the miner died before he could testify regarding his employment, we disagree. Claimant's Brief at 9-14, 46-48. Because it is claimant's burden to establish the length of coal mine employment, *Kephart v. Director, OWCP*, 8 BLR 1-185, 1-186 (1985), the administrative law judge was not required to ascertain on her own initiative whether each of the miner's employers was a mine operator or otherwise involved in coal extraction or production. Nor does the miner's death, before he could testify, warrant remand for further development of the evidence. If claimant is able to produce additional evidence, she may request modification within one year of the denial of this claim. *See* 20 C.F.R. §725.310(a).

[11] "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).

Exhibit 16. The district director sent Dr. Rothfleisch a letter, dated August 6, 2012, stating that COPD "falls under the legal definition of pneumoconiosis," and that the miner had "qualifying (and valid) Pulmonary Function Studies and 26 years of coal mine employment." *Id*. The letter asked Dr. Rothfleisch how he attributed all of the miner's impairment to cigarette smoking, and "why 26 years of coal mine employment has no bearing on any pulmonary disability." *Id*. Dr. Rothfleisch then issued a supplemental report, dated December 15, 2012, amending his original conclusion "[i]n view of the fact that COPD falls under the legal definition of pneumoconiosis," and opining that the miner's coal mine employment and coal dust exposure "in fact played a substantial role in his disability." *Id*. Dr. Colella, in his report dated January 3, 2015, concluded that "excessive tobacco use played a causal role in the development" of the miner's COPD. Employer's Exhibit 6.

The administrative law judge initially gave more weight to Dr. Rothfleisch's opinion because he is Board-certified in Internal Medicine and Pulmonary Disease, but ultimately determined that neither physician's opinion was well-documented or well-reasoned, and thus found that claimant failed to establish that the miner had legal pneumoconiosis. Decision and Order at 22-24. The administrative law judge discredited Dr. Rothfleisch's opinion because it may have been based on a "grossly inaccurate length of coal mine employment."[12] In addition, she discounted his opinion because Dr. Rothfleisch appeared to base his opinion "solely on his presumption that COPD falls under the definition of legal pneumoconiosis," without explaining the contribution of coal mine dust to the miner's COPD, or discussing his exposure to coal mine dust in his job. Finally, the administrative law judge discredited Dr. Rothfleisch's opinion because he did not discuss the effect, if any, of smoking on the miner's COPD, despite noting that the miner smoked a pack of cigarettes a day from the 1970s to 2010. *Id*. at 23.

Claimant argues that Dr. Rothfleisch's opinion is reasoned and documented, and should have been credited to establish the existence of legal pneumoconiosis because it was based on a physical examination and objective medical evidence, and because Dr. Rothfleisch's credentials are superior to those of Dr. Colella. Claimant's Brief at 33-36, 43-44, 49-52. Claimant also argues that Dr. Rothfleisch's opinion considered the miner's

[12] The administrative law judge noted that she had determined that the miner had "approximately eight years of coal mine employment," and that when Dr. Rothfleisch examined the miner, he reviewed the miner's employment history form, on which the miner wrote that he had forty years of coal mine employment. Decision and Order at 23; Director's Exhibit 3. The district director's letter to Dr. Rothfleisch, asking him to explain his initial opinion, stated that the miner had twenty-six years of coal mine employment. Director's Exhibit 16.

smoking and employment histories, and related his COPD to his coal mine employment and dust exposure. *Id*.

We disagree. Determining whether a medical report is documented and reasoned is the task of the administrative law judge. *Kertesz v. Crescent Hills Coal Co.*, 788 F.2d 158, 163, 9 BLR 2-1, 2-8 (3d Cir. 1986). The administrative law judge permissibly discounted Dr. Rothfleisch's opinion on legal pneumoconiosis because, contrary to claimant's contention, Dr. Rothfleisch failed to explain why he attributed the miner's COPD to his coal mine dust exposure, and failed to address the impact of the miner's smoking on his COPD.[13] *See Balsavage v. Director, OWCP*, 295 F.3d 390, 397, 22 BLR 2-386, 2-396 (3d Cir. 2002); *Consolidation Coal Co. v. Kramer*, 305 F.3d 203, 211, 22 BLR 2-467, 2-481 (3d Cir. 2002); Decision and Order at 23; Director's Exhibit 16. We therefore affirm the administrative law judge's discrediting of Dr. Rothfleisch's opinion. Because it was the only medical opinion in support of a finding of legal pneumoconiosis, we affirm the administrative law judge's finding that claimant did not establish the existence of legal pneumoconiosis pursuant to 20 C.F.R. §718.202(a).

Finally, claimant argues that the administrative law judge erred in finding that the evidence did not establish that the miner's total disability was due to pneumoconiosis pursuant to 20 C.F.R. §718.204(c). Claimant's Brief at 52. Having found that claimant established that the miner had clinical pneumoconiosis but not legal pneumoconiosis, the relevant inquiry before the administrative law judge was whether the miner's clinical pneumoconiosis was a substantially contributing cause of his total disability. 20 C.F.R. §718.204(c). The administrative law judge determined that no doctors provided an opinion on this issue, and thus found that claimant failed to establish disability causation.[14] Decision and Order at 28-29.

[13] Because the administrative law judge provided a valid basis for according less weight to Dr. Rothfleisch's opinion on the issue of legal pneumoconiosis, we need not address claimant's arguments for crediting the opinion. *See Kozele v. Rochester & Pittsburgh Coal Co.*, 6 BLR 1-378, 1-382 n.4 (1983).

[14] Neither Dr. Rothfleisch nor Dr. Colella diagnosed clinical pneumoconiosis, contrary to the administrative law judge's finding. Director's Exhibit 16; Employer's Exhibit 6. The administrative law judge discredited Dr. Rothfleisch's opinion that the miner was totally disabled due to COPD for the same reasons she cited in discrediting his opinion regarding legal pneumoconiosis. Decision and Order at 28-29; Director's Exhibit 16. Dr. Colella did not provide an opinion on total disability or whether the miner was totally disabled due to pneumoconiosis. Employer's Exhibit 6.

Contrary to claimant's contention, the opinion of Dr. Pascucci, a pathologist who performed an autopsy on the miner, is not substantial evidence to support a finding of total disability due to pneumoconiosis, because the pathologist did not address that issue. Claimant's Brief at 52; Decision and Order at 29. Dr. Pascucci cited moderate-to-severe clinical pneumoconiosis as the cause of the miner's death, but she did not offer an opinion on total disability, or the cause of any totally disabling respiratory or pulmonary impairment pursuant to 20 C.F.R. §718.204(c)(1). Claimant's Exhibit 9; Decision and Order at 29. Moreover, as the administrative law judge noted, no evidence, including Dr. Pascucci's report, established that the miner's clinical pneumoconiosis caused his COPD or another totally disabling impairment. Decision and Order at 29.

We thus affirm the administrative law judge's finding that the evidence did not establish that the miner's clinical pneumoconiosis was a substantially contributing cause of his disability, pursuant to 20 C.F.R. §718.204(c). Because claimant failed to establish that the miner's total disability was due to pneumoconiosis, an essential element of entitlement under 20 C.F.R. Part 718, we affirm the denial of benefits. *See Trent*, 11 BLR at 1-27; *Perry*, 9 BLR at 1-2.

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

SO ORDERED.

BETTY JEAN HALL, Chief
Administrative Appeals Judge

JUDITH S. BOGGS
Administrative Appeals Judge

JONATHAN ROLFE
Administrative Appeals Judge