U.S. Department of Labor

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

BRB No. 25-0165 BLA

DORRIS CUNNINGHAM Claimant-Respondent v. ISLAND CREEK COAL COMPANY and CONSOL ENERGY, INCORPORATED Employer/Carrier-Petitioners DIRECTOR, OFFICE OF WORKERS' COMPENSATION PROGRAMS, UNITED STATES DEPARTMENT OF LABOR Party-in-Interest	)	**NOT-PUBLISHED** DATE ISSUED: 05/20/2026 DECISION and ORDER

Appeal of the Decision and Order Awarding Benefits and Order on Employer's Motion for Reconsideration of Jason A. Golden, Administrative Law Judge, United States Department of Labor.

M. Alexander Russell, Scott Lu, and Austin P. Vowels (Vowels Law PLC), Henderson, Kentucky, for Claimant.

Joseph D. Halbert and Adam O. Stanley (Halbert Legal, PLLC), Lexington, Kentucky, for Employer.

Before: ROLFE, JONES, and ULMER, Administrative Appeals Judges.

PER CURIAM:

Employer appeals Administrative Law Judge (ALJ) Jason A. Golden's Decision and Order Awarding Benefits and his Order on Employer's Motion for Reconsideration (2021-BLA-05706) rendered on a request for modification of a subsequent claim filed on February 18, 2014,[1] pursuant to the Black Lung Benefits Act, as amended, 30 U.S.C. §§901-944 (Act).

In a May 17, 2017 Decision and Order Denying Benefits, ALJ Colleen A. Geraghty credited Claimant with thirty-nine years of coal mine employment, based on the parties' stipulation, and found all of his work was aboveground at an underground mine. ALJ Geraghty determined Claimant has legal, but not clinical, pneumoconiosis and did not establish a totally disabling respiratory or pulmonary impairment. 20 C.F.R. §§718.202(a), 718.204(b)(2). Thus, she also found Claimant could not invoke the presumption of total disability due to pneumoconiosis at Section 411(c)(4) of the Act,[2] 30 U.S.C. §921(c)(4), or establish entitlement to benefits under 20 C.F.R. Part 718. Consequently, she found Claimant did not establish a change in an applicable condition of entitlement,[3] 20 C.F.R.

[1] This is Claimant's third claim for benefits. Claimant filed his more recent prior claim on January 26, 2005, which ALJ Pamela L. Wood denied on January 10, 2008, because Claimant did not establish a change in an applicable condition of entitlement since the prior denial of benefits. Joint Exhibit 1 at 830-51, 1654-57. Claimant filed a request for modification on December 1, 2008, which ALJ Alice M. Craft ultimately denied on October 29, 2012, because Claimant did not establish he has a totally disabling respiratory or pulmonary impairment. *Id.* at 312-35, 828. Claimant took no further action until filing his current claim.

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

[3] When a miner files a claim for benefits more than one year after the denial of a previous claim becomes final, the ALJ must also deny the subsequent claim unless he finds that "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). Because Claimant failed to establish total disability in his prior claim, he

§725.309(c), and denied benefits. Claimant timely appealed to the Benefits Review Board, which affirmed ALJ Geraghty's denial of benefits and denied Claimant's subsequent motion for reconsideration. Claimant then filed a petition for review with the United States Court of Appeals for the Sixth Circuit, which denied the petition and Claimant's request for rehearing.

Claimant timely requested modification. Director's Exhibit 51. In his April 30, 2024 Decision and Order Awarding Benefits, the subject of the current appeal, ALJ Golden (the ALJ) found Claimant has thirty-nine years of coal mine employment with at least fifteen years in conditions substantially similar to an underground coal mine. He also found Claimant established a totally disabling respiratory or pulmonary impairment, 20 C.F.R. §718.204(b)(2), and therefore established a change in an applicable condition of entitlement, 20 C.F.R. §725.309(c), and invoked the Section 411(c)(4) presumption of total disability due to pneumoconiosis. The ALJ further determined Employer failed to rebut the presumption, Claimant established a mistake in a determination of fact, 20 C.F.R. §725.310, and that granting Claimant's request for modification renders justice under the Act. Finding that the medical evidence did not establish when Claimant became totally disabled, he awarded benefits commencing as of December 2014, the first month after the November 21, 2014 non-qualifying pulmonary function studies.

Employer timely moved for reconsideration, asserting that the ALJ's commencement date finding of December 2014 is incorrect. The ALJ granted Employer's motion for the purpose of reconsidering whether Claimant established a mistake in a determination of fact or a change in conditions. 20 C.F.R. §725.310. Giving controlling weight to Dr. Istanbouly's opinion concerning the timing of Claimant's total pulmonary or respiratory disability, the ALJ found Claimant became totally disabled sometime before November 20, 2014, but was not yet totally disabled in March 2014 based on the non-qualifying pulmonary function study and blood gas study values obtained that month. Thus, because the ALJ determined Claimant was totally disabled before May 2017, when ALJ Geraghty issued her decision and order denying benefits, he concluded Claimant demonstrated a mistake in a determination of fact, rather than a change in conditions. He therefore ruled that his "Decision and Order Awarding Benefits issued on April 30, 2024 stands" as supplemented by his January 28, 2025 Order on Employer's Motion for Reconsideration.

On appeal, Employer argues the ALJ erred in determining the commencement date for benefits because the ALJ's total disability determination indicated a change in

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had to submit new evidence establishing that element of entitlement to obtain review of the merits of his current claim. *Id.*

conditions and not a mistake of fact. Claimant responds in support of the ALJ's commencement date finding. The Director, Office of Workers' Compensation Programs, has not filed a substantive response.

The Board's scope of review is defined by statute. We must affirm the ALJ's Decision and Orders if it they are rational, supported by substantial evidence, and in accordance with applicable law.[4] 33 U.S.C. §921(b)(3), as incorporated by 30 U.S.C. §932(a); *O'Keeffe v. Smith, Hinchman & Grylls Assocs., Inc.*, 380 U.S. 359 (1965).

Commencement Date of Benefits

The date for the commencement of benefits is the month in which the Miner became totally disabled due to pneumoconiosis. 20 C.F.R. §725.503(b); *see Lykins v. Director, OWCP*, 12 BLR 1-181, 1-182 (1989). If a claim is awarded on modification based on a change in conditions, Claimant is entitled to benefits as of the month of onset of total disability due to pneumoconiosis, "provided that no benefits shall be payable for any month prior to the effective date of the most recent denial of the claim by a district director or [ALJ]." 20 C.F.R. §725.503(d)(2). If the date of onset of total disability due to pneumoconiosis is not ascertainable, benefits are payable "from the month in which the claimant requested modification." *Id.* If modification is based on the correction of a mistake in a determination of fact, including the ultimate fact of entitlement, Claimant is entitled to benefits from the month he first became totally disabled due to pneumoconiosis or, if that date is not ascertainable, from the month he filed his claim, unless credited evidence establishes that he was not disabled at any subsequent time. 20 C.F.R. §725.503(b), (d)(1); *see Owens v. Jewell Smokeless Coal Corp.*, 14 BLR 1-47, 1-50 (1990). Additionally, in a subsequent claim, benefits may not be paid for any period before the date on which the order denying the prior claim became final. 20 C.F.R. §725.309(c).

As indicated above, the ALJ observed the record does not establish when Claimant first became totally disabled, but his pulmonary function testing does not support a finding of disability prior to November 21, 2014. Decision and Order at 36. Therefore, the ALJ found Claimant is entitled to benefits commencing December 2014, "the first month and year after Claimant filed his claim and after he was not disabled." *Id.* In considering Employer's motion for reconsideration, the ALJ concluded Claimant established a mistake in determination of fact, rather than a change in conditions, based on Dr. Istanbouly's

[4] The Board will apply the law of the United States Court of Appeals for the Sixth Circuit as Claimant performed his last coal mine employment in Kentucky. *Shupe v. Director, OWCP*, 12 BLR 1-200 (1989) (en banc); Director's Exhibit 4; 2022 Hearing Transcript at 12-13.

opinion that Claimant is totally disabled given the non-qualifying November 20, 2014 arterial blood gas values that demonstrate exertional hypoxemia. Order on Employer's Motion for Reconsideration at 6.

Employer argues the ALJ erred in awarding benefits beginning December 2014, as he relied on "new evidence," which signifies Claimant established a change in conditions and not a mistake in a determination of fact. Employer's Brief at 2-3. To the extent the ALJ relied on Dr. Istanbouly's opinion to support his commencement date finding, Employer asserts substantial evidence does not support a total disability determination prior to ALJ Geraghty's denial of benefits in May of 2017. *Id.* at 4. Thus, Employer contends the ALJ should have found March 2020 as the commencement date for benefits – the month in which Claimant filed his modification request. We disagree.

Because it is relevant to the ALJ's commencement date determination, we will initially set forth and analyze the ALJ's findings concerning total disability and whether Claimant established a change in conditions or a mistake in a determination of fact at 20 C.F.R. §725.310.

The ALJ may grant modification based on either a change in conditions or a mistake in a determination of fact. 20 C.F.R. §725.310(a). In considering whether a change in conditions has been established, the ALJ must perform an independent assessment of the newly submitted evidence, in conjunction with the previously submitted evidence, to determine if the weight of the new evidence is sufficient to establish at least one element of entitlement that defeated an award in the prior decision. *See Kingery v. Hunt Branch Coal Co.*, 19 BLR 1-6, 1-11 (1994); *Nataloni v. Director, OWCP*, 17 BLR 1-82 (1993); *Kovac v. BCNR Mining Corp.*, 14 BLR 1-156 (1990), *modified on recon.*, 16 BLR 1-71 (1992). With respect to mistakes of fact, an ALJ may correct any mistake "including the ultimate issue of benefits eligibility." *Youghiogheny & Ohio Coal Co. v. Milliken*, 200 F.3d 942, 954 (6th Cir. 1999); *Consol. Coal Co. v. Worrell*, 27 F.3d 227, 230 (6th Cir. 1994); *Jessee v. Director, OWCP*, 5 F.3d 723, 724-25 (4th Cir. 1993). Moreover, a party need not submit new evidence on modification because an ALJ has broad discretion "to correct mistakes of fact, whether demonstrated by wholly new evidence, cumulative evidence, or merely further reflection on the evidence initially submitted."[5] *O'Keeffe v. Aerojet-General Shipyards, Inc.*, 404 U.S. 254, 256 (1971).

[5] Employer contends the Board "should consider whether the award would still be granted if the Claimant did not have the benefit of any of this later evidence that exhibits a change in his condition from not disabled to disabled." Employer's Brief at 3. However, Employer cites no support for its assertion and, given that the ALJ can find a mistake in determination of fact based on new or cumulative evidence or even on the evidence initially

Total Disability

A miner is totally disabled if his pulmonary or respiratory impairment, standing alone, prevents 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 qualifying pulmonary function or arterial blood gas studies,[6] 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 Defore v. Ala. By-Products Corp.*, 12 BLR 1-27, 1-28-29 (1988); *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). The ALJ found Claimant established total disability based on the pulmonary function study and medical opinion evidence and based on a weighing of the evidence as a whole.[7] 20 C.F.R. §718.204(b)(2)(i), (iv); Decision and Order at 24.

Pulmonary Function Studies

The ALJ considered four studies dated March 5, 2014, November 20, 2014, July 7, 2017, and March 4, 2022. Decision and Order at 8-13. The March 5, 2014 study produced non-qualifying values before the administration of a bronchodilator; no post-bronchodilator values were obtained. Director's Exhibit 11 at 4. The November 20, 2014 study produced non-qualifying results before and after administration of a bronchodilator. Joint Exhibit 2 at 19. The July 7, 2017 study produced qualifying results before the administration of a bronchodilator and non-qualifying results after. Claimant's Exhibit 2

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submitted, we reject its contention. *See O'Keeffe*, 404 U.S. at 256. Employer also relies on *Amax Coal Co. v. Franklin*, 957 F.2d 355 (7th Cir. 1992), to argue that the current case does not involve a mistake in fact because it does not include a letter from a physician postdating the ALJ's decision. Employer's Brief at 4. We reject this assertion. While a change in conditions requires the submission of new evidence, a mistake in a determination of fact does not require the submission of any additional evidence. *See O'Keeffe*, 404 U.S. at 256; 20 C.F.R. §725.310(c).

[6] A "qualifying" pulmonary function study or blood gas study yields results equal to or less than the applicable table values contained in Appendices B and C of 20 C.F.R. Part 718, respectively. A "non-qualifying" study yields results exceeding those values. *See* 20 C.F.R. §718.204(b)(2)(i), (ii).

[7] The ALJ found the arterial blood gas study evidence does not support a finding of total disability and there is no evidence of cor pulmonale with right-sided congestive heart failure. 20 C.F.R. §718.204(b)(2)(ii), (iii); Decision and Order at 7, 13-14.

at 1, 7. The March 4, 2022 study produced qualifying results before and after administration of a bronchodilator. Claimant's Exhibit 7 at 1.

The ALJ gave more weight to the July 7, 2017 and March 4, 2022[8] studies because they are more recent, and he found the pre-bronchodilator values of these studies entitled to more weight because "the use of a bronchodilator does not provide an adequate assessment of disability." Decision and Order at 13 (quoting 45 Fed. Reg. 13,678, 13,682 (Feb. 29, 1980)). Thus, the ALJ found the pulmonary function study evidence supports a finding of total disability. 20 C.F.R. §718.204(b)(2)(i). Employer has not challenged this finding; therefore, we affirm it. *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710, 1-711 (1983); Decision and Order at 13.

Medical Opinion Evidence

The ALJ considered the medical opinions of Drs. Chavda, Sood, Istanbouly, Selby, and Tuteur. Decision and Order at 14-23. Drs. Chavda, Sood, and Istanbouly diagnosed Claimant with a totally disabling pulmonary or respiratory impairment, while Drs. Selby and Tuteur did not. Director's Exhibit 11; Claimant's Exhibit 5, Employer's Exhibit 4; Joint Exhibits 2, 3. The ALJ gave probative weight to the opinions of Drs. Chavda, Sood, and Istanbouly, finding them well-reasoned and consistent with the objective evidence. Decision and Order at 15-19, 23. In contrast, he gave no weight to the opinions of Drs. Selby and Tuteur because they did not sufficiently explain their extrapolation process concerning the pulmonary function study values for a man over seventy-one years old or adequately explain how Claimant could perform the exertional requirements of his usual coal mine work[9] given his physical limitations. *Id.* at 19-23. Therefore, the ALJ found the medical opinion evidence supports a finding of total disability. 20 C.F.R. §718.204(b)(2)(iv); Decision and Order at 23.

Weighing the evidence as a whole, the ALJ gave controlling weight to the pulmonary function study evidence, as supported by the medical opinion evidence and

[8] The ALJ considered Drs. Vuskovich's and Tuteur's opinions challenging the validity of the March 4, 2022 pulmonary function study but found they are not persuasive and therefore concluded the study is "reliable for making a disability determination." Decision and Order at 11-12; *see* Employer's Exhibits 8, 9. Employer has not challenged this finding, and we therefore affirm it. *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710, 1-711 (1983).

[9] The ALJ determined Claimant's usual coal mine work was "strenuous" and required "heavy manual labor." Decision and Order at 7. Employer has not challenged this finding, and we therefore affirm it. *See Skrack*, 6 BLR at 1-711.

treatment records,[10] to find Claimant established total disability at 20 C.F.R. §718.204(b)(2)(iv).[11] Decision and Order at 23-24. Thus, he also found Claimant established a change in an applicable condition of entitlement at 20 C.F.R. §725.309(c) and a mistake in a determination of fact at 20 C.F.R. §725.310. *Id.* at 24.

In its motion for reconsideration, Employer did not directly challenge the ALJ's total disability determination but rather argued that because the ALJ relied on the more recent pulmonary function studies and the opinions of Drs. Istanbouly and Chavda – all of which was submitted after ALJ Geraghty's May 2017 denial of benefits – Claimant cannot establish a mistake in a determination of fact. Employer's Motion for Reconsideration at 2 (unpaginated). Instead, it stated that "[t]he ALJ should consider whether the award would still be granted if the Claimant did not have the benefit of any of this later evidence that exhibits a change in his condition from not disabled to disabled." *Id.*

The ALJ granted Employer's motion for the purpose of reconsidering whether Claimant established a mistake in a determination of fact or a change in condition and for determining when Claimant became totally disabled. Order on Reconsideration at 2. The ALJ noted all of the pulmonary function and arterial blood gas studies performed prior to the May 2017 denial of benefits, as well as the treatment records, do not support a finding of total disability prior to May 2017. *Id.* at 3. He summarized Claimant's 2014 deposition and 2016 hearing testimonies, acknowledging that they are "slightly inconsistent" but determined the testimony is credible and supports that Claimant had daily breathing issues prior to May 2017. *Id.* at 3-4. He found that Drs. Chavda's and Sood's opinions do not assist Claimant in demonstrating a mistake in a determination of fact, as they do not support that Claimant was totally disabled prior to May 2017. *Id.* at 4-5.

[10] The ALJ considered the treatment records, including Dr. Clapp's records concerning his treatment of Claimant from February 27, 2018 to December 28, 2021. Decision and Order at 24; *see* Claimant's Exhibit 1. He found that the records do not independently support a finding of total disability, but they corroborate the physician's opinions concerning Claimant's physical symptoms, including shortness of breath. Decision and Order at 23. Employer has not challenged this finding and we therefore affirm it. *See Skrack*, 6 BLR at 1-711.

[11] The ALJ indicated that he considered all of the evidence from Claimant's prior claims but gave "the most probative weight" to the evidence submitted in his current subsequent claim based on the progressive nature of pneumoconiosis and because it is a more accurate representation of his current medical condition. Decision and Order at 24.

But the ALJ also determined that Dr. Istanbouly based his total disability opinion, in part, on Claimant's November 2014 exercise blood gas study and found that Dr. Istanbouly "provided a reasoned explanation that Claimant would have been hypoxic during his exercise [arterial blood gas] test in November 2014 had he continue to exercise." Order on Reconsideration at 5 (quoting Decision and Order at 19). The ALJ explained that his reasons for discrediting the contrary opinions of Drs. Selby and Tuteur were not based on the blood gas study evidence and neither opinion refuted Dr. Istanbouly's opinion that the November 2014 blood gas study showed exertional hypoxemia that would prevent Claimant from performing the exertional requirements of his usual coal mine work. *Id.* at 6.

Giving "controlling weight" to Dr. Istanbouly's opinion concerning the timing of Claimant's totally disabling respiratory or pulmonary impairment, the ALJ determined Claimant became totally disabled prior to November 20, 2014. *Id.* Based on the non-qualifying March 5, 2014 pulmonary function study and the non-qualifying March 11, 2014 blood gas study, the ALJ also found Claimant was not totally disabled in March 2014. *Id.* Because the ALJ found the evidence establishes Claimant was totally disabled prior to May 2017, he concluded Claimant demonstrated a mistake in a determination of fact rather than a change in conditions. *Id.*

Concerning the ALJ's reliance on Dr. Istanbouly's opinion to establish Claimant was totally disabled based on the November 2014 blood gas study, and therefore established a mistake in a determination of fact, Employer contends:

> [T]his is merely conjecture and essentially amounts to the trier of fact arbitrarily weighing evidence. There is no objective evidence of a disabling impairment prior to the evidence developed subsequent to ALJ Geraghty's denial, which is why ALJ Geraghty found that the miner failed to establish a disabling impairment at that point. Any opinion that the miner "would have been" hypoxic is not supported by the actual medical data and would not be substantial evidence upon which a disability determination could be based.

Employer's Brief at 4.

Contrary to Employer's assertion, the fact that none of the objective studies were qualifying prior to ALJ Geraghty's denial does not preclude a finding of total disability. Notwithstanding non-qualifying objective testing, total disability may be established by a reasoned medical opinion that the miner is unable to perform his usual coal mining work. 20 C.F.R. §718.204(b)(2)(iv); *see Cornett v. Benham Coal, Inc.*, 227 F.3d 569, 577 (6th Cir. 2000); *Killman v. Director, OWCP*, 415 F.3d 716, 721-22 (7th Cir. 2005). Dr. Istanbouly reviewed the March 11, 2014 and November 20, 2014 blood gas studies, both

of which had non-qualifying values. Claimant's Exhibit 5 at 2, 13; *see* Joint Exhibits 1 at 37, 268; 2 at 28-29. Dr. Istanbouly opined that "[r]egardless of this patient's age[,] there is significant and confirmed exertional hypoxemia revealed on [two] cardiopulmonary exercise tests," with the November 2014 study being "relatively more accurate as an arterial line was used." Claimant's Exhibit 5 at 2. He noted that the November 2014 study was terminated because Claimant hit his target heart rate prematurely, possibly due to coronary artery disease (CAD). *Id.* Dr. Istanbouly indicated that without CAD, Claimant "would have been able to exercise a little longer and subsequently his hypoxia would have been worse." *Id.* He concluded that Claimant could not "do any physical job out of the coal mines including light duty jobs." *Id.* at 3.

Thus, as permitted by 20 C.F.R. §718.204(b)(2)(iv), Dr. Istanbouly explained that regardless of whether the 2014 study was qualifying, it is still sufficient to show exertional hypoxemia that would preclude Claimant from performing any coal mine employment. To the extent they are adequately briefed,[12] Employer's arguments amount to a request 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). Employer has not otherwise challenged the ALJ's total disability findings. Consequently, we affirm the ALJ's determination that Claimant established a totally disabling respiratory or pulmonary impairment at 20 C.F.R. §718.204(b)(2) and therefore established a change in an applicable condition of entitlement at 20 C.F.R. §725.309(c). *See Skrack*, 6 BLR at 1-711; Decision and Order at 23-24. In addition, we affirm, as unchallenged, the ALJ's determinations that Claimant invoked the Section 411(c)(4) presumption, Employer failed to rebut the presumption, and Claimant's request for modification rendered justice under the Act. *See Skrack*, 6 BLR at 1-711; Decision and Order at 24, 30, 34-35.

We further affirm the ALJ's reliance on Dr. Istanbouly's opinion to find that Claimant established a mistake in a determination of fact at 20 C.F.R. §725.310. *See Worrell*, 27 F.3d at 230; Order on Reconsideration at 6. Thus, we affirm the ALJ's determination that Claimant is entitled to benefits commencing in December 2014. 20

[12] Employer has not explained how the ALJ arbitrarily weighed the evidence or how the "actual medical data" conflicts with Dr. Istanbouly's opinion and instead relies on its mistaken belief that the objective studies must be qualifying to support a finding of total disability. Employer's Brief at 4; 20 C.F.R. §802.211(b) (requirements for an issue to be adequately briefed); *Cox v. Benefits Review Board*, 791 F.2d 445, 446-47 (6th Cir. 1986); *Sarf v. Director, OWCP*, 10 BLR 1-119, 1-120-21 (1987); *Fish v. Director, OWCP*, 6 BLR 1-107, 1-109 (1983).

C.F.R. §725.503(b); *see Williams v. Director, OWCP*, 13 BLR 1-28, 1-29-30 (1989); *Lykins*, 12 BLR at 1-182.

Accordingly, we affirm the ALJ's Decision and Order Awarding Benefits and his Order on Employer's Motion for Reconsideration.

SO ORDERED.

JONATHAN ROLFE
Administrative Appeals Judge

MELISSA LIN JONES
Administrative Appeals Judge

GLENN E. ULMER
Administrative Appeals Judge