U.S. Department of Labor

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

BRB No. 22-0307 BLA

DOUGLAS A. HARTSOCK	)	
	)	
Claimant-Petitioner	)	
	)	
v.	)	
	)	
APACHE COAL COMPANY, INCORPORATED	)	
	)	
and	)	
	)	DATE ISSUED: 9/29/2023
OLD REPUBLIC INSURANCE COMPANY	)	
	)	
Employer/Carrier-Respondents	)	
	)	
DIRECTOR, OFFICE OF WORKERS' COMPENSATION PROGRAMS, UNITED STATES DEPARTMENT OF LABOR	)	
	)	
Party-in-Interest	)	DECISION and ORDER

Appeal of the Decision and Order on Remand Denying Benefits of Francine L. Applewhite, Administrative Law Judge, United States Department of Labor.

Douglas A. Hartsock, Castlewood, Virginia.

Michael A. Pusateri (Greenberg Traurig LLP), Washington, D.C., for Employer and its Carrier.

Before: GRESH, Chief Administrative Appeals Judge, ROLFE and JONES, Administrative Appeals Judges.
PER CURIAM:

Claimant appeals, without representation,[1] Administrative Law Judge (ALJ) Francine L. Applewhite's Decision and Order on Remand Denying Benefits (2016-BLA-05710) on a subsequent claim filed on April 24, 2014,[2] pursuant to the Black Lung Benefits Act, 30 U.S.C. §§901-944 (2018) (Act). This case is before the Benefits Review Board for a second time.

In the initial Decision and Order Awarding Benefits, ALJ Morris D. Davis credited Claimant with 3.086 years of coal mine employment and found the new evidence established a totally disabling respiratory impairment. 20 C.F.R. §718.204(b)(2). He therefore found while Claimant was unable to invoke the rebuttable presumption of total disability at Section 411(c)(4) of the Act,[3] Claimant established a change in an applicable condition of entitlement.[4] 20 C.F.R. §725.309. Assessing the claim under 20 C.F.R. Part

[1] Robin Napier, a benefits counselor with Stone Mountain Health Services of St. Charles, Virginia, requested the Benefits Review Board review the ALJ's decision on Claimant's behalf, but she does not represent Claimant on appeal. *See Shelton v. Claude V. Keene Trucking Co.*, 19 BLR 1-88 (1995) (Order).

[2] The district director denied Claimant's previous claim, filed on July 3, 2012, for failure to establish any element of entitlement. Director's Exhibit 1.

[3] 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) (2018); *see* 20 C.F.R. §718.305.

[4] 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); *see 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 did not establish any element of entitlement in his previous claim, he had to submit evidence establishing at least one element to obtain review of the merits of his current claim. *White*, 23 BLR at 1-3; Director's Exhibit 1.

718, he further found Claimant established total disability due to legal pneumoconiosis[5] and thus awarded benefits. 20 C.F.R. §§718.202, 718.204(c).

Pursuant to an appeal by Employer and its Carrier (Employer), the Board affirmed ALJ Davis's findings that Claimant established 3.086 years of qualifying coal mine employment, total disability, and a change in an applicable condition of entitlement. *Hartsock v. Apache Coal Co*., BRB No. 19-0091 BLA, slip op. at 3, n.5 (Feb. 28, 2020) (unpub.). However, the Board vacated his findings that Claimant established legal pneumoconiosis and total disability due to legal pneumoconiosis. *Id*. at 9-10. Further, the Board vacated ALJ Davis's finding that Claimant failed to establish clinical pneumoconiosis.[6] *Id.* at 10. The case was thus remanded to the Office of Administrative Law Judges for further consideration. Specifically, the Board instructed ALJ Davis to reconsider whether Claimant established clinical or legal pneumoconiosis and whether either disease was a substantially contributing cause of his total respiratory disability. *Id.* at 10-11. The case was thereafter reassigned to ALJ Applewhite (the ALJ) upon ALJ Davis's retirement.

On remand, the ALJ found Claimant failed to establish either clinical or legal pneumoconiosis, and therefore did not prove a necessary element of entitlement. 20 C.F.R. §718.202(a). Therefore, she denied benefits.

On appeal, Claimant generally challenges the ALJ's denial of benefits. Employer responds in support of the denial. The Director, Office of Workers' Compensation Programs, has not filed a response brief.

In an appeal a claimant files without representation, the Board considers whether the Decision and Order below is supported by substantial evidence. *Hodges v. BethEnergy Mines, Inc*., 18 BLR 1-84, 1-86 (1994). We must affirm the ALJ's findings of fact and conclusions of law if they are rational, supported by substantial evidence, and in

[5] 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). This definition encompasses 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).

[6] 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).

accordance with applicable law.[7] 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).

Entitlement Under 20 C.F.R. Part 718

Without the benefit of the Section 411(c)(3)[8] and (c)(4) presumptions, Claimant must establish disease (pneumoconiosis); disease causation (it arose out of coal mine employment); disability (a totally disabling respiratory or pulmonary impairment); and disability causation (pneumoconiosis substantially contributed to the disability). 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 v. Valley Camp of Utah, Inc*., 12 BLR 1-111, 1-112 (1989); *Trent v. Director, OWCP*, 11 BLR 1-26, 1-27 (1987); *Perry v. Director, OWCP*, 9 BLR 1-1 (1986) (en banc).

Clinical Pneumoconiosis

ALJ Davis considered ten interpretations of five x-rays, dated December 12, 2012, June 11, 2014, August 27, 2015, April 12, 2017, and May 11, 2017. Decision and Order at 6-7, 19-20; Director's Exhibits 10, 23, 28-30; Claimant's Exhibits 1, 2; Employer's Exhibits 1, 2, 4. The Board found no error in ALJ Davis's "findings with regard to each specific x-ray," where the June 11, 2014 and August 27, 2015 x-rays were positive for clinical pneumoconiosis, the readings of the April 12, 2017 x-ray were equivocal, and the May 11, 2017 x-ray was negative for pneumoconiosis.[9] *Hartsock*, BRB No. 19-0091, slip op. at 10, n.15. However, the Board vacated the ALJ Davis's overall finding that the x-ray

[7] The Board will apply the law of the United States Court of Appeals for the Fourth Circuit because Claimant performed his last coal mine employment in Virginia. *See Shupe v. Director, OWCP*, 12 BLR 1-200, 1-202 (1989) (en banc); Hearing Transcript at 18.

[8] As ALJ Davis previously found, there is no evidence demonstrating complicated pneumoconiosis; thus, Claimant cannot invoke the irrebuttable presumption of total disability due to pneumoconiosis at Section 411(c)(3) of the Act, 30 U.S.C. §921(c)(3) (2018). *See* 20 C.F.R. §718.304; Decision and Order at 17, 20.

[9] The Board did not include in its summary the December 12, 2012 x-ray, which ALJ Davis found to be "equivocal" given the conflicting readings by two dually-qualified readers. *Hartsock v. Apache Coal Co*., BRB No. 19-0091 BLA, slip op. at 10, n.15 (Feb. 28, 2020) (unpub.); Decision and Order at 19. Given that the panel explained that ALJ Davis considered five x-rays, the readings of two of which he found equivocal, the exclusion of December 12, 2012 from its list of x-rays was simply an oversight. *Hartsock*, BRB No. 19-0091 BLA, slip op. at 10.

evidence was equivocal and thus did not establish clinical pneumoconiosis because the panel was unable to discern ALJ Davis's rationale. *Id.* at 10.

On remand, notwithstanding the Board's prior holding, the ALJ again weighed the readings for each specific x-ray, coming to the same conclusions as ALJ Davis regarding the December 12, 2012, June 11, 2014, August 27, 2015, April 12, 2017, and May 11, 2017 x-rays. Decision and Order on Remand at 3-4. However, in addition to those considered by ALJ Davis, the ALJ also considered a negative interpretation of an x-ray dated August 17, 2012. Decision and Order on Remand at 3-4; Employer's Exhibit 1. That x-ray reading was uncontradicted; thus, the ALJ found it was negative for pneumoconiosis. Decision and Order on Remand at 3. Thus, finding two of the x-rays support a finding of pneumoconiosis, two refute a finding of pneumoconiosis, and the readings of two are in equipoise, the ALJ found the x-ray evidence "neither supports nor refutes" Claimant's burden to establish clinical pneumoconiosis. Decision and Order on Remand at 3-4.

The ALJ erroneously considered Dr. Adcock's interpretation of the August 17, 2012 x-ray, as it exceeds the evidentiary limitations in the regulations. *See* 20 C.F.R. §725.414(a); Decision and Order on Remand at 3; Employer's Exhibit 1.

The regulations set limits on the number of specific types of medical evidence the parties can submit into the record. *See* 20 C.F.R. §§725.414; 725.456(b)(1). Regarding x-ray evidence, each party may submit, in support of its affirmative case, "no more than two chest [x]-ray interpretations." 20 C.F.R. §725.414(a)(2)(i), (3)(i). In rebuttal of the case presented by the opposing party, each party may submit "no more than one physician's interpretation of each chest [x]-ray . . . submitted by" the opposing party. 20 C.F.R. §725.414(a)(2)(ii), (a)(3)(ii). Medical evidence that exceeds the evidentiary limitations "shall not be admitted into the hearing record in the absence of good cause." 20 C.F.R. §725.456(b)(1).

As part of his affirmative case, Claimant designated two x-ray interpretations: Dr. Alexander's positive interpretation of the December 12, 2012 x-ray and Dr. DePonte's positive interpretation of the April 12, 2017 x-ray. Claimant's May 30, 2017 Evidence Summary Form; Director's Exhibit 23; Claimant's Exhibit 1. Employer also designated two x-ray interpretations as part of its affirmative case: Dr. Fino's negative interpretation of the August 27, 2015 x-ray and Dr. Kendall's negative interpretation of the May 11, 2017 x-ray.[10] Employer's June 1, 2017 Evidence Summary Form (Employer's Evidence

[10] Claimant submitted Dr. Alexander's positive reading of the August 27, 2015 x-ray as rebuttal to Employer's x-ray evidence and Dr. Alexander's positive reading of the June 11, 2014 x-ray in rebuttal of the Department of Labor (DOL)'s interpretation of that

Summary Form); Director's Exhibit 30; Employer's Exhibit 2. In rebuttal of Claimant's evidence, Employer designated Dr. Adcock's negative interpretations of the August 17, 2012, December 12, 2012, and April 12, 2017 x-rays. Employer's Evidence Summary Form; Employer's Exhibits 1, 4. Employer also designated Dr. Adcock's negative reading of the June 11, 2014 x-ray to rebut the Department of Labor (DOL) sponsored reading of that x-ray. Employer's Evidence Summary Form; Director's Exhibit 28.

Thus, Employer submitted and designated more than its permitted number of rebuttal x-ray readings. As noted, Claimant submitted positive readings of the December 12, 2012 and April 12, 2017 x-rays as part of his affirmative case, while the DOL sponsored a reading of the June 11, 2014 x-ray. Consequently, Employer could not designate Dr. Adcock's negative reading of the August 17, 2012 x-ray as rebuttal evidence. 20 C.F.R. §725.414(a)(3)(ii). Moreover, there is no room to consider the x-ray as affirmative evidence, as Employer has also filled its affirmative evidence slots for x-ray reading designations. 20 C.F.R. §725.414(a)(3)(i). Because Dr. Adcock's negative reading of the August 17, 2012 x-ray exceeds Employer's evidentiary limitations and Employer has not attempted to argue good cause for permitting the reading to be admitted in excess of the evidentiary limitations,[11] the ALJ should not have considered it.[12] 20 C.F.R. §725.456(b)(1).

The ALJ is obligated to enforce the evidentiary limitations even if no party objects. *See Smith v. Martin Cnty. Coal Corp.*, 23 BLR 1-69, 1-74 (2004) (evidentiary limitations set forth in the regulations are mandatory and, as such, are not subject to waiver). Because

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x-ray. Director's Exhibits 10, 29; Claimant's Exhibit 2; Claimant's May 30, 2017 Evidence Summary Form.

[11] Employer did not directly address the issue in its response brief. However, its summary of the evidence demonstrates the discrepancy, as it noted the ALJ considered "eleven readings of six chest films submitted for litigation," Employer's Response at 4, but later indicated that five x-rays were designated. Employer's Brief at 5. We note that it does not appear that Employer intended to rely on Dr. Adcock's August 17, 2012 x-ray interpretation, as in its briefing below it noted five designated x-rays and did not discuss the x-ray in its arguments. *See* Employer's Brief on Remand at 5, 19-20.

[12] ALJ Davis admitted without objection Employer's Exhibit 1, containing Dr. Adcock's August 17, 2012 and December 12, 2012 readings, but advised the parties of the requirements to designate evidence within the regulatory limitations. Hearing Transcript at 12-14. He did not specifically address the Employer's rebuttal designations, but also did not consider Dr. Adcock's August 17, 2012 x-ray interpretation in his decision.

she failed to apply the evidentiary limitations with respect to the August 17, 2012 x-ray reading, we find she abused her discretion and therefore we must vacate her finding that Claimant failed to establish clinical pneumoconiosis based on the x-ray evidence. *McClanahan v. Brem Coal Co*., 25 BLR 1-171, 1-175 (2016); *Keener v. Peerless Eagle Coal Co*., 23 BLR 1-229, 1-236 (2007) (en banc).

However, remand is not required for the ALJ to again weigh the properly designated x-rays together. The Board previously affirmed ALJ Davis's findings regarding the individual x-rays dated December 12, 2012, June 11, 2014, August 27, 2015, April 12, 2017, and May 11, 2017: the readings of two are in equipoise, two are positive, and one negative. *Hartsock*, BRB No. 19-0091 BLA, slip op. at 10, n.15. On remand, while not instructed to reassess each x-ray, the ALJ made the same findings. Decision and Order on Remand at 3-4. Both ALJs qualitatively weighed each x-ray, properly considering the qualifications of each reader. *Harris v. Old Ben Coal Co.*, 23 BLR 1-98, 1-114 (2006) (en banc), *aff'd on recon*., 24 BLR 1-13 (2007) (en banc); *Worhach v. Director, OWCP*, 17 BLR 1-105, 1-108 (1993). The two x-rays whose readings are in equipoise weigh neither for nor against the presence of disease. *See Director, OWCP v. Greenwich Collieries* [*Ondecko*], 512 U.S. 267, 280-81 (1994). Thus, the remaining x-rays to weigh together include two positive x-rays and one negative x-ray, which are preponderantly positive for clinical pneumoconiosis.[13] Thus, the x-ray evidence is positive for clinical pneumoconiosis. 20 C.F.R. §718.202(a)(1).

Nonetheless, remand is required for the ALJ to weigh the x-ray evidence against the relevant treatment records and medical opinion evidence. The ALJ failed to consider and weigh the medical opinion and Claimant's treatment record evidence relevant to the issue.[14] *See McCune v. Cent. Appalachian Coal Co.*, 6 BLR, 1-996, 1-998 (1984); Director's Exhibits 10, 16, 30; Claimant's Exhibits 5-7; Employer's Exhibits 3, 5, 6.

[13] Employer generally argues the most recent negative x-ray should be given the most weight because once present, pneumoconiosis does not improve. Employer's Response at 11-12. However, the Fourth Circuit has held that an ALJ may not credit more recent evidence solely on the basis of recency where the miner's condition has improved. *See Adkins v. Director, OWCP*, 958 F.2d 49, 51-52 (4th Cir. 1992).

[14] Claimant's treatment records include x-ray reports dated March 7, 2007, and February 28, 2011, and CT scans dated September 8, 2007, January 24, 2007, March 17, 2008, and March 31, 2015. Claimant's Exhibits 6, 7.

Legal Pneumoconiosis

To establish legal pneumoconiosis, Claimant must prove he has a "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).

The ALJ considered the medical opinion of Dr. Ajjarapu that Claimant has legal pneumoconiosis in the form of chronic bronchitis caused by coal mine dust exposure, as well as long-term tobacco use, and those of Drs. Fino and Rosenberg, who opined he has chronic obstructive pulmonary disease (COPD) in the form of emphysema due to smoking, unrelated to coal mine dust exposure.[15] Decision and Order on Remand at 4-7; Director's Exhibits 10, 16; Employer's Exhibits 3, 5, 6. The ALJ afforded "some weight" to each of the three medical opinions and found that the overall evidence does not support a finding of legal pneumoconiosis. Decision and Order on Remand at 7.

The Board previously affirmed ALJ Davis's discrediting of Drs. Rosenberg's and Fino's opinions on legal pneumoconiosis. *Hartsock*, BRB No. 19-0091, slip op. at 8. However, the Board determined ALJ Davis "did not adequately explain [his] findings with respect to Dr. Ajjarapu's opinion." *Id.* ALJ Davis's "finding of legal pneumoconiosis [did] not account for Dr. Ajjarapu's specific diagnoses," mischaracterized the physician's opinion, and inadequately explained his findings under the Administrative Procedure Act (APA).[16] *Id.* at 9. The Board instructed ALJ Davis to "determine whether Dr. Ajjarapu's opinion is adequately reasoned to satisfy Claimant's burden of proof, taking into consideration her credentials, her specific diagnoses, the explanations for her conclusions, her understanding of Claimant's smoking and work histories, the documentation underlying her medical judgment, and the sophistication of, and bases for, her opinion." *Id.* at 11.

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[15] We affirm, as supported by substantial evidence, the ALJ's determination to afford less weight to Claimant's treatment records on the issue of legal pneumoconiosis for while they note diagnoses of chronic obstructive pulmonary disease, emphysema, and chronic bronchitis, they do not provide the etiology of those diseases. *See Compton v. Island Creek Coal Co.*, 211 F.3d 203, 207-208 (4th Cir. 2000); *Milburn Colliery Co. v. Hicks*, 138 F.3d 524, 528 (4th Cir. 1998); Decision and Order on Remand at 7.

[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).

When the Board remands a case, the ALJ must comply with its instructions and "implement both the letter and spirit of the . . . mandate." *Scott v. Mason Coal Co*., 289 F.3d 263, 267 (4th Cir. 2002) (quoting *United States v. Bell*, 5 F.3d 64, 66 (4th Cir. 1993)). A lower tribunal must act in strict compliance with remand instructions from a higher tribunal without altering, amending, or examining them. *See Sullivan v. Hudson*, 490 U.S. 877, 886 (1989).

While the ALJ briefly summarized Dr. Ajjarapu's opinion and noted the physician's qualifications, she failed to adhere to the Board's instructions. *See Sullivan*, 490 U.S. at 886 ("Deviation from the court's remand order in the subsequent administrative proceedings is itself legal error."). The ALJ did not evaluate or explain whether Dr. Ajjarapu's opinion was adequately reasoned based on the criteria the Board provided, but rather only summarily provided Dr. Ajjarapu's opinion "some weight." Decision and Order on Remand at 4-7; *see Hartsock*, BRB No. 19-0091, slip op. at 11. Thus, the ALJ's consideration of Dr. Ajjarapu's opinion is inadequate under the APA. 30 U.S.C. §932(a); *Wojtowicz v. Duquesne Light Co*., 12 BLR 1-162, 1-165 (1989); Decision and Order on Remand at 7.

Employer acknowledges that the ALJ's assessment of legal pneumoconiosis is "sparse" and "almost certainly fall[s] short of the Board's remand instructions;" however, it argues that any error is harmless as the opinions of Drs. Fino and Rosenberg are better-reasoned and documented than Dr. Ajjarapu's and thus outweigh her opinion. Employer's Brief at 13-15. However, Employer also acknowledges the Board's affirmance of ALJ Davis's discrediting of Drs. Fino's and Rosenberg's medical opinions; thus, we reject Employer's argument that the ALJ's failure to adequately explain her crediting of Dr. Ajjarapu's opinion is harmless.[17] Employer's Brief at 3, 15.

Thus, we vacate the ALJ's finding that the evidence does not support a finding of legal pneumoconiosis. *See* 20 C.F.R. §718.202(a)(4); *Wojtowicz*, 12 BLR at 1-165; Decision and Order on Remand at 7. As we vacate the ALJ's finding that clinical and legal pneumoconiosis were not established, we also vacate her determination that Claimant did

[17] Employer characterizes the ALJ Davis's use of the preamble to the 2001 amended regulations to discredit Drs. Fino and Rosenberg as "illegal." Employer's Brief at 3. Contrary to Employer's contention, the courts have repeatedly held an ALJ may evaluate expert opinions in conjunction with the preamble. *See Harman Mining Co. v. Director, OWCP* [*Looney*], 678 F.3d 305, 313 (4th Cir. 2012); *Cent. Ohio Coal Co. v. Director, OWCP* [*Sterling*], 762 F.3d 483, 491 (6th Cir. 2014); *Helen Mining Co. v. Director, OWCP* [*Obush*], 650 F.3d 248, 257 (3d Cir. 2011); *Consolidation Coal Co. v. Director, OWCP* [*Beeler*], 521 F.3d 723, 726 (7th Cir. 2008).

not establish total disability due to pneumoconiosis. 20 C.F.R. §718.204(c); Decision and Order on Remand at 7.

Remand Instructions

On remand, the ALJ must reconsider whether Claimant established clinical and legal pneumoconiosis. 20 C.F.R. §718.202(a). In addressing clinical pneumoconiosis, the ALJ must consider the relevant treatment record and medical opinion evidence and weigh it together with the positive x-ray evidence to determine if Claimant has established clinical pneumoconiosis. 20 C.F.R. §718.202; *Island Creek Coal Co. v. Compton*, 211 F.3d 203, 208-09 (4th Cir. 2000).

When addressing legal pneumoconiosis, the ALJ must assess whether Dr. Ajjarapu's opinion is adequately reasoned to satisfy Claimant's burden of proof, taking into consideration the physician's credentials, her specific diagnoses, the explanations for her conclusions, her understanding of Claimant's smoking and work histories, the documentation underlying her medical judgment, and the sophistication of, and bases for, her opinion. *See Milburn Colliery Co. v. Hicks*, 138 F.3d 524, 533 (4th Cir. 1998); *Sterling Smokeless Coal Co. v. Akers*, 131 F.3d 438, 441 (4th Cir. 1997). If Claimant establishes clinical or legal pneumoconiosis, the ALJ must determine whether either disease is a substantially contributing cause of his total respiratory disability. 20 C.F.R. §718.204(c).

In reaching all her determinations on remand, the ALJ must adequately explain the bases for her findings of fact and conclusions of law in accordance with the APA. *See Wojtowicz*, 12 BLR at 1-165.

Accordingly, we affirm in part and vacate in part the ALJ's Decision and Order on Remand Denying Benefits, and we remand the case for further consideration consistent with this opinion.

SO ORDERED.

DANIEL T. GRESH, Chief
Administrative Appeals Judge

JONATHAN ROLFE
Administrative Appeals Judge

MELISSA LIN JONES
Administrative Appeals Judge