BRB No. 01-0513

CLYDE STRAHAN	)	
	)	
Claimant-Petitioner	)	DATE ISSUED:March 4, 2002
	)	
v.	)	
	)	
AVONDALE INDUSTRIES, INCORPORATED	)	
	)	
	)	
Self-Insured Employer-Respondent	)	DECISION and ORDER

Appeal of the Decision and Order Denying Benefits of Richard D. Mills, Administrative Law Judge, United States Department of Labor.

Arthur J. Brewster, Metairie, Louisiana, for claimant.

Richard S. Vale and Pamela F. Noya (Blue Williams, L.L.P.), Metairie, Louisiana, for self-insured employer.

Before: DOLDER, Chief Administrative Appeals Judge, SMITH and McGRANERY, Administrative Appeals Judges.

PER CURIAM:

Claimant appeals the Decision and Order Denying Benefits (2000-LHC-363; 2000-LHC-1430) of Administrative Law Judge Richard D. Mills rendered on a claim filed pursuant to the provisions of the Longshore and Harbor Workers' Compensation Act, as amended, 33 U.S.C. §901 *et seq*. (the Act). We must affirm the findings of fact and conclusions of law of the administrative law judge if they are rational, supported by substantial evidence, and in accordance with law. *O'Keeffe v. Smith, Hinchman & Grylls Associates, Inc.*, 380 U.S. 359 (1965); 33 U.S.C. §921(b)(3).

On May 22, 1990, while working as a shipfitter for employer, claimant was struck by a beam that was being lowered by a crane. Claimant immediately sought medical treatment at employer's first aid clinic, complaining of back, neck, and knee pain. Dr. Mabey, employer's shipyard physician, diagnosed claimant as having sustained a back sprain for which he prescribed first Vicodin and later Darvocet. Claimant was subsequently released to return to work where, on September 25, 1990, he sustained an injury to his right knee. Claimant has since undergone both an anterior cervical fusion and a lumbar laminectomy. Employer voluntarily paid claimant temporary

total disability compensation from June 9, 1990 until June 13, 1990, November 5, 1990 until July 28, 1991, June 5, 1992 until June 22, 1992, and October 1, 1992 until September 29, 1999. 33 U.S.C. §908(b). Additionally, employer paid all of claimant's medical expenses related to his two work-injuries. 33 U.S.C. §907.

In his Decision and Order, the administrative law judge found that claimant established his *prima facie* case with respect to his back, neck, and knee injuries, that claimant was therefore entitled to the Section 20(a) presumption, 33 U.S.C. §920(a), and that employer presented no evidence rebutting that presumption. Regarding claimant's back and neck injuries, however, the administrative law judge also determined that those work-related conditions reached maximum medical improvement as of September 18, 1990, and that claimant failed to establish that his present back and neck conditions are related to his employment with employer. Rather, the administrative law judge concluded that claimant's post-September 1990 orthopedic conditions are the result of a separate non work-related injury. Next, the administrative law judge determined that claimant's current psychiatric problems are not work-related. Lastly, although he made no finding as to whether claimant established a *prima facie* case of total disability, the administrative law judge found that employer established the availability of suitable alternate employment; accordingly, the administrative law judge awarded claimant temporary total disability benefits from June 9, 1990 until June 13, 1990, as a result of his back and neck injuries, temporary total disability benefits from November 5, 1990 until July 28, 1991, and from June 5, 1992 until June 22, 1992, as a result of his knee injury, and permanent partial disability compensation for a 5 percent impairment to claimant's leg as a result of that knee condition.

On appeal, claimant challenges the administrative law judge's findings that his present back and psychiatric conditions are not related to his employment with employer, as well as the administrative law judge's conclusions regarding the nature and extent of his work-related disability. Employer responds, urging affirmance of the administrative law judge's decision in its entirety.

Claimant's Orthopedic Conditions[1]

Once the Section 20(a), 33 U.S.C. §920(a), presumption has been invoked, as in this case, the burden shifts to employer to rebut the presumption with substantial evidence that claimant's

[1]We reject claimant's contention that employer's stipulation regarding the amount of benefits voluntarily paid to claimant should equate to a stipulation that a causal relationship existed between claimant's medical conditions during the payment of those benefits and claimant's employment. Rather, the stipulations entered into by the parties establish that the issue of causation was unresolved. *See* Jt. Ex. 1.

orthopedic conditions were not caused or aggravated by his employment. *See Conoco, Inc. v. Director, OWCP [Prewitt],* 194 F.3d 684, 33 BRBS 187(CRT) (5th Cir. 1999); *Swinton v. J. Frank Kelly, Inc.*, 554 F.2d 1075, 4 BRBS 466 (D.C. Cir.), *cert. denied,* 429 U.S. 820 (1976); *see also Del Vecchio v. Bowers*, 296 U.S. 280 (1935); *American Grain Trimmers, Inc. v. OWCP,* 181 F.3d 810, 33 BRBS 71(CRT) (7th Cir. 1999); *Duhagon v. Metropolitan Stevedore Co.,* 169 F.3d 615, 33 BRBS 1(CRT) (9th Cir. 1999); *Bath Iron Works Corp. v. Director, OWCP*, 109 F.3d 53, 31 BRBS 19(CRT) (1st Cir. 1997); *Devine v. Atlantic Container Lines, G.I.E.*, 23 BRBS 279 (1990). In this regard, the testimony of a physician that no relationship exists between an injury and a claimant's employment is sufficient to rebut the presumption. *See Kier v. Bethlehem Steel Corp.*, 16 BRBS 128 (1984). Moreover, employer can rebut the presumption by producing substantial evidence that claimant's disabling condition was caused by a subsequent non work-related event that was not the natural or unavoidable result of the initial work injury. *See Bludworth Shipyard, Inc. v. Lira,* 700 F.2d 1046, 15 BRBS 120(CRT)(5th Cir. 1983); *Cyr v. Cresent Wharf & Warehouse Co.*, 211 F.2d 454 (9th Cir. 1954); *Bailey v. Bethlehem Steel Corp.*, 20 BRBS 14 (1987), *aff'd mem.* No. 89-4803 (5th Cir. April 19, 1990); *White v. Peterson Boatbuilding Co.*, 29 BRBS 1 (1995). Where the subsequent injury or aggravation is not a natural or unavoidable result of the work injury, but is the result of an intervening cause, employer is relieved of liability for disability attributable to the intervening cause. *Wright v. Connolly-Pacific Co.,* 25 BRBS 161 (1991), *aff'd mem. sub nom. Wright v. Director, OWCP,* 8 F.3d 34 (9th Cir. 1993). If the administrative law judge finds that the Section 20(a) presumption is rebutted, he must weigh all of the evidence and resolve the causation issue based on the record as a whole. *See O'Kelley v. Dept. of the Army/NAF,* 34 BRBS 39 (2000); *see also Director, OWCP v. Greenwich Collieries*, 512 U.S. 267, 28 BRBS 43(CRT) (1994).

In his decision, the administrative law judge initially determined that claimant is entitled to invocation of the Section 20(a), 33 U.S.C. §920(a), presumption linking his orthopedic conditions to his employment with employer. Next, the administrative law judge divided the claim into periods, the first relating to claimant's back problems from May to September 1990, and the second involving his ongoing condition beginning in May 1992. The administrative law judge determined that employer failed to present any evidence rebutting the invoked presumption with regard to the immediate effect of claimant's May 22, 1990, work-injury, but concluded that claimant's present orthopedic complaints are due to a subsequent non work-related injury. For the reasons that follow, we agree with claimant that because the findings made by the administrative law judge with respect to claimant's back and neck conditions are not supported by substantial evidence or consistent with law, the administrative law judge's conclusion that claimant's orthopedic conditions subsequent to September 18, 1990, are the result of a separate non work-related injury cannot be affirmed.

In addressing this issue, the administrative law judge relied on Dr. Mabey, employer's shipyard physician, finding that he indicated that claimant's back problems are the result of

degenerative changes in claimant's back. However, Dr. Mabey testified that while his review of claimant's x-rays indicated the presence of slight degenerative changes in claimant's lower cervical vertebrae, his diagnosis of claimant's condition following his May 22, 1990 work injury was one of a muscle strain. *See* Cl. Ex. 22 at 12. Moreover, Dr. Mabey stated that claimant represented a vulnerable class of employees and that claimant's continued post-May 1990 complaints of back pain, for which he sought and received treatment and medication, were the result of claimant's work being too hard. *Id.* at 70-73. Dr. Mabey ultimately opined that claimant's muscle strain resolved by September 18, 1990, and that his subsequent complaints were unrelated to either his May 1990 or September 1990 work incidents. *Id.* at 37.

While the administrative law judge could rely on Dr. Mabey's opinion, in this case he did not consider the voluminous contrary medical evidence, nor did he properly apply the Section 20(a) presumption. The administrative law judge found that claimant reached maximum medical improvement for his May 22, 1990, work-injury on September 18, 1990, that claimant was released to work without restrictions on that date, and that claimant did not significantly complain about his back condition between September 18, 1990 and May 1992. *See* Decision and Order at 12-13. This finding led the administrative law judge to conclude that there were two separate back injuries in this case, one caused by the work accident while the other was not. There are numerous errors in this analysis which require remand. First, contrary to the administrative law judge's finding, the medical reports and testimony of record contain significant references to claimant's continued complaints of back and neck pain subsequent to September 18, 1990. Specifically, Dr. Russo recorded that during his January 14, 1991, examination of claimant, claimant related ongoing neck and back problems which predated his September 1990 knee injury. *See* Emp. Exs. 9 at 5, 9, 11; 30 at 11, 17-18. Two reports from Northlake Physical Therapy, dated May 10, 1991 and May 28, 1991 respectively, also establish that claimant complained of back pain on those dates. *See* Cl. Ex. 2. Lastly, Dr. Farris testified that claimant reported back and neck pain during approximately seven office visits between April 17, 1991 and July 19, 1991, *see* Cl. Ex. 21 at 10, 12-13, 15, 17, 21, and that physical therapy, including cervical traction, full back moist heat and massage, was prescribed on May 14, 1991. *See* Emp. Ex. 9 at 12.

Based upon his conclusion that the claimant's May 1992 back complaints were too far removed from his May 22, 1990, work accident to be connected to that incident, the administrative law judge decided to treat claimant's post-1992 condition as a separate injury and required that claimant either make a specific showing of an additional workplace accident or present additional medical evidence from a treating physician making such a connection. *See* Decision and Order at 12-13. Contrary to the administrative law judge's reasoning, there is no basis on the facts of this case for believing a new injury occurred and no basis in law for requiring one in order for the claim to be compensable . Claimant sought benefits for his total back condition, claiming it was related to the 1990 injury, and Section

20(a) applies to link claimant's entire back condition to the 1990 injury.[2] *See, e.g., Merrill v. Todd Pacific Shipyards Corp.*, 25 BRBS 140 (1991). Thus, as Section 20(a) was invoked, it was employer's burden to introduce evidence that claimant's continuing back pain was not related to the May 1990 injury.

Moreover, claimant did in fact produce the affirmative evidence required by the administrative law judge linking his post-September 1990 orthopedic complaints to his employment with employer. Specifically, Dr. Fleming, who performed claimant's two back surgeries, related claimant's back condition to his May 22, 1990, work accident. *See* Cl. Ex. 23 at 43-44. Similarly, Dr. Bourgeois, who treated claimant following the retirement of Dr. Fleming, found claimant's back condition. to be the result of his work-injury. *See* Cl. Ex. 18 at 32-42. Lastly, Dr. Landry opined that it is probable that claimant's disc herniation occurred as a result of his work-injury. *See* Emp. Ex. 2 at 3. The administrative law judge did not discuss this evidence.

[2]The fundamental error in the administrative law judge's reasoning, aside from his failure to note the evidence of ongoing complaints of back pain, rests on his determination that the time gap between the initial injury in 1990 and claimant's complaints in 1992 demonstrates the absence of a work connection between the two. The Act, however, recognizes that a claimant may suffer latent injuries where the full disabling effects may be unknown for years. *See Port of Portland v. Director, OWCP*, 192 F.3d 933, 33 BRBS 143(CRT) (9th Cir. 1999), *cert. denied*, 120 S.Ct. 1718 (2000).

The administrative law judge's conclusion that claimant's 1992 complaints are the result of a separate injury therefore cannot be affirmed as it ignores claimant's continuing complaints of back pain from 1990 to 1992 and the medical evidence linking claimant's ongoing condition to the 1990 injury and because it rests on an incorrect application of Section 20(a). Where a separate non-work event is alleged as an intervening cause, Section 20(a) allocates the burden of producing evidence regarding such an event to employer. *See James v. Pate Stevedoring Co.,* 22 BRBS 279 (1989). In this case, employer presented no evidence at the formal hearing nor did it argue in its post-hearing brief that claimant's present orthopedic complaints are the result of a subsequent event. Moreover, the record is devoid of any evidence that such an event occurred. Thus, as the administrative law judge's finding that claimant's May 1992 complaints are the result of a subsequent, unidentified, non work-related, separate injury is not supported by substantial evidence, we vacate the administrative law judge's finding that claimant's present orthopedic conditions are not work-related. As Section 20(a) is invoked with regard to claimant's entire back injury, we remand the case for the administrative law judge to consider whether Dr. Mabey's opinion is sufficient to rebut the Section 20(a) presumption with regard to causation.[3] *See* Cl. Ex. 22. If he finds Section 20(a) is rebutted then, as the record contains evidence which, if credited, would support claimant's contention that his post-September 1990 orthopedic complaints are related to his employment with employer, the administrative law judge must weigh all of the evidence and resolve the causation issue based on the record as a whole. *See Devine v. Atlantic Container Lines, G.I.E.,* 23 BRBS 279 (1990); *see also Del Vecchio v. Bowers,* 296 U.S. 280 (1935).

Claimant's Psychological Conditions

A psychological impairment which is work-related is compensable under the Act. *American National Red Cross v. Hagen,* 327 F.2d 559 (7th Cir. 1964); *Manship v. Norfolk & Western Railway Co.*, 30 BRBS 175 (1996); *Konno v. Young Bros., Ltd.*, 28 BRBS 57 (1994); *Sanders v. Alabama Dry Dock & Shipbuilding Co.*, 22 BRBS 340 (1989)(decision on remand). Furthermore, the Section 20(a) presumption is applicable in psychological injury cases. *See Cotton v. Newport News Shipbuilding & Dry Dock Co.*, 23 BRBS 380, 384 n. 2 (1990); 33 U.S.C. §920(a). It is well-established that an employment injury need not be the sole cause of a disability; rather, if the employment injury aggravates, accelerates or combines with an underlying condition, the entire resultant condition is compensable. *See*

[3]Claimant concedes in his brief on appeal that Dr. Mabey testified that claimant's back condition was not related to his May 22, 1990, work accident. *See* Claimant's brief at 16.

Independent Stevedore Co. v. O'Leary, 357 F.2d 812 (9th Cir. 1966). Thus, claimant's psychological injury need be due only in part to work-related conditions to be compensable under the Act. *See Peterson v. General Dynamics Corp.,* 25 BRBS 78 (1991), *aff'd sub nom. Ins. Co. of North America v. U.S. Dept. of Labor, OWCP,* 969 F.2d 1400, 26 BRBS 14(CRT) (2d Cir. 1992), *cert. denied,* 507 U.S. 909 (1993). As we discussed *supra*, upon invocation of the Section 20(a) presumption, the burden shifts to employer to rebut it with substantial evidence that claimant's condition was not caused or aggravated by his employment. *See Swinton v. J. Frank Kelly, Inc.*, 554 F.2d 1075, 4 BRBS 466 (D.C. Cir.), *cert. denied*, 429 U.S. 820 (1976). If the presumption is rebutted, the administrative law judge must weigh all of the evidence contained in the record and resolve the causation issue based on the record as a whole. *See Devine*, 23 BRBS 279; *Greenwich Collieries*, 512 U.S. 267, 28 BRBS 43(CRT).

In addressing this issue, the administrative law judge invoked the Section 20(a) presumption linking claimant's present psychological problems to his employment with employer on the basis that Dr. MacGregor, claimant's treating psychiatrist, believed that claimant's current psychological problems are related to his September 25, 1990, work-injury.[4] *See, e.g., Phillips v. Newport News Shipbuilding & Dry Dock Co.,* 22 BRBS 94 (1988). As no party challenges the administrative law judge's finding that claimant is entitled to invocation of the presumption, it is affirmed.

Next, in concluding that claimant's psychological condition is not employment-related, the administrative law judge found rebuttal of the Section 20(a) presumption based upon the testimony of Dr. Bianchini. *See* Decision and Order at 17. In order to establish rebuttal, however, a medical opinion must state that no relationship exists between claimant's harm and his employment. *See Conoco,* 194 F.3d 684, 33 BRBS 187(CRT). Thus, in order to rebut the Section 20(a) presumption, the opinion of Dr. Bianchini must establish that claimant's employment did not cause claimant's condition nor aggravate, accelerate, or combine with an underlying condition. *See O'Leary*, 357 F.2d 812. Dr. Bianchini's opinion does not do so. Rather, following his initial evaluation of claimant on October 4, 1999, Dr. Bianchini opined that claimant is experiencing some psychological problems from a combination of his physical injuries, failed treatments and long period of inactivity. *See* Emp. Ex. 16 at 11-12. Following a second evaluation of claimant on February

[4]Claimant was diagnosed as suffering from severe dysthymir disorder, the symptoms of which include, *inter alia*, depressive moods, pent up anger and irritability, verbal outbursts, fleeting homicidal ideation and insomnia. *See* Emp. Ex. 7.

8, 2000, Dr. Bianchini opined that claimant, in addition to his pain disorder, was now experiencing a depressive disorder that is not clearly related to his work-injury. *See id.* at 2-3. During his subsequent deposition, Dr. Bianchini stated, when asked whether claimant's emotional or psychological problems were related to his employment, that:

> Well, certainly the physical injuries that he is having and pain themselves can be associated with some psychological problems. So in the sense that there is a causal connection between the accident and his physical symptoms, then I think that some of this is related to that, is related to his physical problems. . . . these things tend to be multi caused, . . . caused by multiple factors, and some of them are related to the work accident, some of them to events, personality styles, interactions, choices that occur after that. . . . I wouldn't say that it is clearly 100 percent related to . . . the work related injury. There is some element of that relationship and there is [sic] other things that play a role, as well.

Cl. Ex. 20 at 40-42. Dr. Bianchini thereafter reiterated his opinion that claimant's psychological problems are "multi determined." *Id.* at 48. As the opinion of Dr. Bianchini supports the conclusion that claimant's current psychological condition is due at least in part to his work injuries, it is insufficient as a matter of law to rebut the Section 20(a) presumption. *See Bridier v. Alabama Dry Dock & Shipbuilding Corp.*, 29 BRBS 84 (1995). We therefore reverse the administrative law judge's finding that the Section 20(a) presumption was rebutted as it relates to claimant's psychological condition. Consequently, the administrative law judge's conclusion that claimant's psychological condition is not work-related is also reversed.[5] *See Manship v. Norfolk & Western Railway Co.*, 30 BRBS at 175; *Bass v. Broadway Maintenance*, 28 BRBS 11 (1994); *see generally ITO Corp. v. Director, OWCP*, 883 F.2d 422, 22 BRBS 126(CRT)(5th Cir. 1989).

[5]We note that employer in its reply brief concedes that the "true issue" presented to the administrative law judge was not the presumed causal relationship between claimant's psychiatric disability and his employment but, rather, whether that disability prevented claimant from returning to work. *See* Emp. brief at 29.

Nature and Extent of Claimant's Disability

Claimant next challenges the administrative law judge's finding that his orthopedic condition became permanent as of September 18, 1990, the date on which Dr. Mabey opined that claimant's condition reached maximum medical improvement. *See* Decision and Order at 15; Cl. Ex. 22. The determination of when maximum medical improvement is reached is primarily a question of fact based on medical evidence. *Eckley v. Fibrex & Shipping Co.*, 21 BRBS 120 (1988); *Ballesteros v. Willamette W. Corp.*, 20 BRBS 184 (1988). An employee has reached maximum medical improvement when he is no longer undergoing treatment with a view toward improving his condition. *See Louisiana Ins. Guaranty Ass'n v. Abbott*, 40 F.3d 122, 29 BRBS 22(CRT) (5th Cir. 1994). Moreover, a claimant's condition may be considered permanent when it has continued for a lengthy period and appears to be of lasting and indefinite duration, as opposed to one in which recovery merely awaits a normal healing period. *See Watson v. Gulf Stevedore Corp.*, 400 F.2d 649 (5th Cir. 1968), *cert. denied*, 349 U.S. 976 (1969).

Because this case is remanded for further consideration regarding the potential causal relationship between claimant's ongoing orthopedic conditions and his employment with employer, we agree with claimant that the administrative law judge's finding of permanency cannot be affirmed. If the administrative law judge determines on remand that claimant's post-September 1990 orthopedic conditions are related to his employment, he must address the considerable medical evidence of record relevant to this issue.[6] Accordingly, we vacate the administrative law judge's finding that claimant's orthopedic condition became permanent as of September 18, 1990; on remand, the administrative law judge must fully discuss the relevant medical evidence in accordance with the applicable legal standards. *See Louisiana Ins. Guaranty Ass'n*, 40 F.3d 122, 29 BRBS 22(CRT); *Watson*, 400 F.2d 649; *Trask v. Lockheed Shipbuilding & Constr. Co.*, 17 BRBS 56 (1985).

Similarly, we agree with claimant that the administrative law judge's determination that employer established the availability of suitable alternate employment must be vacated. It is well-established that claimant bears the burden of establishing the nature and extent of any disability sustained as a result of a work-related injury. *See Anderson v. Todd Shipyards Corp.*, 22 BRBS 20 (1989). Where a claimant establishes that she is unable to perform her

[6]Specifically, the administrative law judge's decision fails to acknowledge the medical testimony of Drs. Bourgeois, Landry and Katz. Additionally, the administrative law judge explicitly declined to consider the opinion of Dr. Williams, as that physician based his findings on claimant's condition following his back surgery. As we have explained, however, claimant's back surgery may have been for a work-related injury, in which case Dr. Williams's opinion is clearly relevant.

usual employment duties due to a work-related injury, the burden shifts to employer to demonstrate the availability of specific jobs within the geographic area in which claimant resides which he is, by virtue of his age, education, work experience, and physical restrictions, capable of performing and for which he can compete and reasonably secure. *See New Orleans (Gulfwide) Stevedores, Inc. v. Turner*, 661 F.2d 1031, 14 BRBS 156 (5th Cir. 1981); *see also Roger's Terminal & Shipping Corp. v. Director, OWCP*, 784 F.2d 687, 18 BRBS 79(CRT)(5th Cir. 1986). Employer may meet this burden by offering claimant a job in its facility. *See Darby v. Ingalls Shipbuilding & Dry Dock Co.*, 99 F.3d 685, 30 BRBS 93(CRT) (5th Cir. 1996); *Darden v. Newport News Shipbuilding & Dry Dock Co.*, 18 BRBS 224 (1986). Although the job within employer's facility must actually be available to claimant, *see Mendez v. National Steel & Shipbuilding Co.*, 21 BRBS 22 (1988), the job may be tailored to claimant's restrictions. *Larsen v. Golten Marine Co.*, 19 BRBS 54 (1986).

In addressing this issue, the administrative law judge did not determine whether claimant had established a *prima facie* case of total disability; rather, the administrative law judge found that even if claimant were able to demonstrate a permanent physical disability, the testimony of Dr. Mabey and Mr. Gelpi, the director of employer's light-duty program, established the availability of suitable alternate employment that claimant was capable of performing. *See* Decision and Order at 16-17. In making this determination, however, the administrative law judge did not address any of the medical testimony of record rendered subsequent to September 1990. Specifically, the testimony of Drs. Bourgeois, Cl. Ex. 18, Dr. Landry, Emp. Ex. 3, Dr. Katz, Emp. Ex. 4, and Dr. Williams, Emp. Ex. 5, all discuss claimant's ability to return to gainful employment. Additionally, the administrative law judge did not address or consider the testimony of Mr. Fentress, claimant's vocational rehabilitation consultant, who testified regarding claimant's ability to return to gainful employment. *See* Cl. Ex. 13. We therefore vacate the administrative law judge's finding regarding the extent of claimant's disability, and we remand the case for the administrative law judge to consider the totality of the evidence regarding the issue of whether employer established the availability of suitable alternate employment.

Accordingly, the administrative law judge's determination that claimant's psychiatric condition is not work-related is reversed. The administrative law judge's findings regarding the lack of a causal relationship between claimant's orthopedic conditions and his employment, and the nature and extent of claimant's disability, are vacated, and the case is remanded for reconsideration consistent with this opinion.

SO ORDERED.

NANCY S. DOLDER, Chief

Administrative Appeals Judge

ROY P. SMITH
Administrative Appeals Judge

REGINA C. McGRANERY
Administrative Appeals Judge