

ATTACHMENT A

THE PROPOSED DECISION

**BEFORE THE
BOARD OF ADMINISTRATION
CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM
STATE OF CALIFORNIA**

In the Matter of the Application for Disability Retirement of:

R.S.¹, Respondent

and

**R.J. DONOVAN CORRECTIONAL FACILITY, CALIFORNIA
DEPARTMENT OF CORRECTIONS AND REHABILITATION,
Respondent.**

Agency Case No. 2022-0471

OAH No. 2022090407

¹ A motion was made to seal the entire record in order to protect the identity of respondent, due to the crime incidents involving domestic violence (stalking) in this matter. The motion was unopposed. However, the undersigned determined it is appropriate to instead use respondent's initials (R.S.) in the Proposed Decision, and redact and/or seal the documents in the record, as ordered in the Protective and Sealing Order.

PROPOSED DECISION

Jami A. Teagle-Burgos, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter by videoconference on January 13, 2023.

Helen L. Louie, Attorney at Law, represented petitioner, Keith Riddle, Chief, Disability and Survivor Benefits Division, Board of Administration, California Public Employees' Retirement System (CalPERS), State of California.

R.S., respondent, represented herself.

There was no appearance by R.J. Donovan Correctional Facility (Donovan), California Department of Corrections and Rehabilitation (CDCR). Upon proof of compliance with Government Code sections 11504 and 11509, this matter proceeded as a default against Donovan/CDCR, pursuant to Government Code section 11520.

Oral and documentary evidence was received. The record was closed, and the matter was submitted for decision on January 13, 2023.

PROTECTIVE AND SEALING ORDER

Exhibits 8 and 9, and A through H, contain evaluations, crime and arrest reports, an incident report, and restraining orders, involving victims of domestic violence (stalking) and minor children, are subject to a protective and sealing order. Any of these exhibits received as evidence in this matter shall be redacted before any disclosure to the public. No court reporter or transcription service shall transcribe the contents of these documents but shall instead refer to them solely as the title of the

exhibit, and the respondent, R.S., shall be referred to as "Respondent" and the minor children shall be referred to as "Child 1" and "Child 2." To protect privacy and confidential personal information from inappropriate disclosure, Exhibits 8 and 9, and A through H, in this matter are ordered sealed. A reviewing court, parties to this matter, their attorneys, and a government agency decision maker or designee under Government Code section 11517, may review the documents subject to this order, provided that such documents are protected from release to the public.

ISSUE

At the time of R.S.'s application for disability retirement, was she permanently disabled or incapacitated from performing the usual and customary duties of a Senior Psychologist Specialist, due to her psychiatric conditions (acute stress disorder)?

SUMMARY OF DECISION

R.S. had the burden to prove that, at the time of her application, she was permanently disabled or incapacitated from performing her regular and customary job duties as a Senior Psychologist Specialist. The competent medical evidence presented did not support her claim that she was permanently disabled or incapacitated from performing the regular and customary duties of a Senior Psychologist Specialist, on the basis of her psychiatric conditions (acute stress disorder). As such, R.S.'s claim for disability retirement based on her psychiatric conditions is denied.

FACTUAL FINDINGS

Preliminary Matters

1. R.S. was employed by Donovan as a Senior Psychologist Specialist. By virtue of her employment, R.S. was a state safety member of CalPERS subject to Government Code section 21151. R.S. has the minimum service credit necessary to qualify for retirement.

2. On April 26, 2021, R.S. signed an application for disability retirement with CalPERS. Her last day on payroll at Donovan was November 18, 2020. She alleged her disability occurred on November 10, 2019, and her specific disability is "acute stress disorder." R.S. claimed she was entitled to a disability retirement because she "was a victim of a crime in Nov 2019 which required life changes due to significant safety issues." She reported, "I could not work in the same work location (RJD) since it compromised my safety." Her ability to perform her job is affected, and she wrote, "I am unable to be physically onsite. I am able to telework. The management team allowed for telework temporarily but then did not approve it beyond my last day of work."

3. CalPERS obtained medical records and reports related to R.S.'s conditions, and selected Matthew F. Carroll, M.D., a board-certified psychiatrist, to perform a disability evaluation. Dr. Carroll provided CalPERS with narrative reports of his findings and conclusions. After reviewing all of those documents, CalPERS determined that when R.S. filed her application for disability retirement, she was not permanently disabled or incapacitated from performing the usual and customary duties of a Senior Psychologist Specialist, due to her psychiatric conditions.

4. On April 11, 2022, CalPERS issued a determination and notified R.S. that her application for disability retirement, due to her psychiatric conditions (acute stress disorder), was denied. CalPERS advised R.S. of her right to appeal that adverse determination.

5. On May 9, 2022, R.S. timely filed her appeal and a hearing was scheduled with OAH.

6. On August 8, 2022, petitioner filed a Statement of Issues in his official capacity. The Statement of Issues, notice of hearing, and other jurisdictional documents were served on respondents.

Job Description Documents

7. The documents entitled "Essential Functions of a Senior Psychologist Specialist," and the "Physical Requirements" of that position outlined the tasks and physical requirements of respondent's position. Dr. Carroll relied upon those documents in formulating his opinion.

CalPERS's Medical Evaluation Conducted by a Medical Expert

REPORTS AND TESTIMONY OF DR. CARROLL

8. The following is a summary of the reports of medical expert, Dr. Carroll, as well as his testimony, which is consistent with his reports. He is a board certified psychiatrist since 1996 with a subspecialty in forensic psychiatry since 1997. He earned a degree in biology from the Cornell University in 1984 and a medical degree from George Washington University in 1989. He completed his residency at Balboa Naval Medical Center, and a fellowship at Case Western Reserve University in 1999. He served in the United States Navy from 1989 until 2002, as a psychiatrist and general

physician. He has a private practice where he has conducted forensic evaluations for CalPERS since 2002, workers compensation cases, and other civil matters. He was employed by San Diego County as a psychiatrist in its emergency unit at a county hospital and a forensic clinic for cases at the downtown court. For 14 years, he conducted weekly evaluations mostly involving post-traumatic stress disorder (PTSD) at the Department of Veterans Affairs. He has significant experience with patients who suffer from "very serious PTSD" in the military involving injuries from improvised explosive devices (IEDs), sexual assault, and domestic violence. He is an assistant clinical professor at the University of California, San Diego, and an adjunct professor at the University of San Diego. Dr. Carroll is a medical expert in his field.

9. Dr. Carroll reviewed the treatment records of R.S. that were prepared by Rochelle Bastien, Ph.D., her treating psychologist. Dr. Carroll reviewed 31 session notes by Dr. Bastien who reported that R.S.'s symptoms included sleep disturbance, agitation, intrusive ruminations, difficulty maintaining concentration, generalized anxiety with feelings of paranoia, and persistent and sometimes irrational fears. Dr. Bastien had assessed that R.S. was not able to work at her job because of PTSD and she needed to avoid "areas in which she may encounter the stalker, especially [the] prison environment." At the hearing, Dr. Carroll testified that he disagreed with the assessment of Dr. Bastien.

10. On March 1, 2022, Dr. Carroll conducted an Independent Medical Examination (IME) of R.S., and prepared an initial IME report for CalPERS on March 8, 2022, with the following assessment: R.S. had been in an abusive relationship with her ex-boyfriend, who is the father of her two daughters. R.S.'s ex-boyfriend has stalked her, and she suffers from nervousness and anxiousness. She and her children left California and went to Maryland, and returned to California about eight months later.

Dr. Carroll diagnosed R.S. with PTSD. At the hearing, Dr. Carroll testified that acute stress disorder is the "condition just before PTSD." During his evaluation, R.S. had a fairly intact mental status examination with a normal affect, although she appeared anxious when discussing her ex-boyfriend. He administered the Minnesota Multiphasic Personality Inventory-2 (MMPI) test and found she had a personality disorder profile, but this was normal considering she is a victim of domestic violence, and she has been harmed by her ex-boyfriend through stalking. Dr. Carroll assessed that R.S. was substantially incapacitated, and she could not work at her job as a Senior Psychologist Specialist because of her concerns of having to physically work at Donovan, versus telework, and because her ex-boyfriend might find her at Donovan if she is physically working there.

11. However, Dr. Carroll prepared a follow-up report on March 28, 2022, which indicated that he was asked to review his initial assessment of R.S., and specifically, he was asked to look at substantial incapacity. Upon his review, Dr. Carroll clarified that R.S.'s fear of having to physically report to work at Donovan is a prophylactic restriction rather than a substantial incapacity. Dr. Carroll explained that R.S.'s fear of physically working at Donovan, versus working at Donovan in a telework capacity, also involved speculation as to what could happen if her ex-boyfriend showed up at her work at Donovan. He explained this is a prophylactic restriction, which is a limitation "in case something happened in the future." Dr. Carroll looked at R.S.'s functioning and found she was able to move to Maryland with her children, become a licensed psychologist in Maryland, obtain employment as a private practice psychologist in Maryland, move back to California with her children, and continue her employment as a psychiatrist with her Maryland employer, in a telework capacity, 30 hours a week. She is also able to care for her children. Based on these findings, Dr. Carroll determined that although R.S. has mild PTSD, she is able to function relatively

well under her circumstances, she is able to physically work at Donovan, and therefore, she is not substantially incapacitated from performing the normal and customary duties of her job at Donovan.

Respondent's Evidence

TESTIMONY OF R.S. AND THE CRIME REPORTS, INCIDENT REPORT, AND PROTECTIVE ORDERS

12. The following is a summary of the testimony of R.S., which is consistent with the supporting documents that she submitted, including police reports², an incident report, and restraining orders.

13. R.S. earned her undergraduate degree in psychology from Catholic University in 2002 and her doctorate degree in psychology from Alliant University in 2008. In 2011, she was retained as a staff psychologist at Donovan as a full-time

² All police reports discussed herein were admitted pursuant to *Lake v. Reed* (1997) 16 Cal.4th 448. In *Lake*, the California Supreme Court concluded that direct observations memorialized in a police officer's report were admissible under Evidence Code section 1280, the public employee records exception to the hearsay rule, and were sufficient to support a factual finding. The court further concluded that admissions by a party memorialized in such a report were admissible under Evidence Code section 1220 and were sufficient to support a factual finding. Citing Government Code section 11513, the court held that other hearsay statements set forth in the police officer's report could be used to supplement or explain other evidence, but they were not sufficient, by themselves, to support a factual finding, unless the hearsay evidence would be admissible over objection in civil actions.

independent contractor. She was hired in her position as a Senior Psychologist Specialist at Donovan as a full-time state employee in 2013. She was promoted to be the inpatient clinical director at the prison. She was promoted to a limited-term position as a chief psychologist in 2017, where she assisted to oversee the psychiatry department and created programs. She was proud of her work.

14. Throughout her employment at Donovan, R.S. was dealing with personal issues involving her ex-boyfriend. There were several incidents where she contacted the police because her ex-boyfriend was stalking her. He had been going to her residence when she was not there and breaking-in. On or about September 18, 2017, and November 1, 2018, the court granted her and her daughters restraining orders against her ex-boyfriend, who is the father of her daughters. On November 2, 2019, a crime report was prepared by the San Diego Police Department, which described an incident when R.S. saw her ex-boyfriend in her backyard and about to enter her house. She had also been out of the country with her daughters, and he had left her voice messages indicating he was in her home while she was gone. On November 11, 2019, the San Diego Police Department prepared another crime report, wherein R.S. reported that R.S. was sleeping, she woke up when her dogs barked, she saw her bedroom window covering was moving, and she saw her ex-boyfriend on her roof. Her window screen had been cut and her sliding door was open. She called the police who responded with a helicopter and police dogs. The police were not able to locate her ex-boyfriend, but they discovered his fingerprints on her cabinets and window. On November 18, 2019, the San Diego Police Department prepared another crime report, wherein R.S. reported that R.S. again discovered her ex-boyfriend on her roof. The police responded again with a helicopter and police dogs, but her ex-boyfriend got away.

15. R.S. went to work the next day on November 19, 2019, but she was fearful and decided she “couldn’t do it anymore.” She and her children took the next flight to Maryland where she stayed with her best friend for about eight months. She was ashamed for suddenly leaving her job, but she felt her life and the lives of her children were in danger due to the stalking by her ex-boyfriend. On November 21, 2019, the court in Maryland granted her and her daughters a restraining order against her ex-boyfriend. While in Maryland, she obtained her professional license and a job at Psychological Solutions LLC, in a private practice psychology group, in a telework capacity.

16. In May 2020, R.S.’s father entered hospice care so she and her children returned to San Diego. On May 18, 2020, the San Diego Police Department prepared an arrest report, which indicated the ex-boyfriend violated the restraining order by being within 100 yards of R.S.’s residence. Her neighbor’s Ring video recorded her ex-boyfriend jump her gate and enter her backyard. The ex-boyfriend was placed under arrest for this violation and for being in possession of crystal methamphetamine. On January 15, 2023, she filed an incident report with the San Diego Police Department because she found that her ex-boyfriend was on the balcony of the home she and her daughters had recently moved to. She followed-up with the San Diego Police Department’s Domestic Violence Unit on February 8, 2023, and was told the matter is being investigated.

17. R.S. testified that her “biggest trigger” is if she is physically at a place where her ex-boyfriend can follow and/or find her. She worked at Donovan for almost eight years. When she suddenly left for Maryland, she was given permission by Donovan to telework. However, after some time, Donovan no longer permitted her to telework, and she was told that she had to physically return to work. She feels that if

she returns to Donovan, her ex-boyfriend will find out and stalk her there. He knew her colleagues at Donovan, and if she physically returns, the "custody staff" will let him know that she is there. She feels that she will also be triggered if she has to drive to work at Donovan because her ex-boyfriend can follow her. Her primary symptom of PTSD is "fearfulness."

18. R.S. testified that she continues to be employed as a private practice psychologist, via telework, with her employer in Maryland. She works 30 hours a week. She is licensed in California and Maryland. Her daughters are now eight and 10 years old. She has maintained full custody of them since 2015. She has never received a child support payment from her ex-boyfriend, whose housing and employment have been chronically unstable.

19. The testimony of R.S. was forthright.

LEGAL CONCLUSIONS

Burden and Standard of Proof

1. Absent a statutory presumption, an applicant for a disability retirement has the burden of proving by a preponderance of the evidence that he or she is entitled to it. (*Glover v. Board of Retirement* (1989) 214 Cal.App.3d 1327, 1332.)

Applicable Statutes

2. Government Code section 20026 defines "disability" and "incapacity for performance of duty," for purposes of a retirement, to mean "disability of permanent or extended and uncertain duration" based on "competent medical opinion."

3. Government Code section 21150, subdivision (a), provides that a member who is "incapacitated for the performance of a duty" shall receive a disability retirement. Section 21151, subdivision (a), provides that such incapacitated member shall receive a disability retirement regardless of age or amount of service.

4. Government Code section 21152, states, in part:

Application to the board for retirement of a member for disability may be made by:

(a) The head of the office or department in which the member is or was last employed, if the member is a state member other than a university member.

[¶] . . . [¶]

(c) The governing body, or an official designated by the governing body, of the contracting agency, if the member is an employee of a contracting agency.

(d) The member or any person in his or her behalf.

5. Government Code section 21153 provides:

Notwithstanding any other provision of law, an employer may not separate because of disability a member otherwise eligible to retire for disability but shall apply for disability retirement of any member believed to be disabled, unless the member waives the right to retire for disability and elects to withdraw contributions or to permit contributions

to remain in the fund with rights to service retirements as provided in section 20731.

6. Government Code section 21154 states, in part:

The application [for disability retirement] shall be made only (a) while the member is in state service, . . . On receipt of an application for disability retirement of a member, other than a local safety member with the exception of a school safety member, the board shall, or of its own motion it may, order a medical examination of a member who is otherwise eligible to retire for disability to determine whether the member is incapacitated for the performance of duty. On receipt of the application with respect to a local safety member other than a school safety member, the board shall request the governing body of the contracting agency employing the member to make the determination.

7. Government Code section 21156, provides that if the medical evaluation or other evidence demonstrates that an eligible member is incapacitated physically or mentally, then CalPERS shall immediately retire the member for disability. The determination of incapacitation shall be based on competent medical opinion.

Appellate Authority

8. Disability is not an inability to perform fully every function of a given position. For nearly 40 years, the courts have consistently and uniformly held that Government Code section 20026, formerly Government Code section 21022, requires "substantial inability" to perform the applicant's "usual duties," as opposed to mere

discomfort or difficulty performing those duties. (*Mansperger v. Public Employees' Retirement System* (1970) 6 Cal.App.3d 873, 877.)³ As such, when an employee can perform his or her usual and customary job duties, even though doing so may be difficult or even painful, the employee is not substantially incapacitated and does not qualify for an industrial disability retirement. (*Id.* at pp. 886-887.)

9. In determining the ultimate question of whether an employee is substantially incapacitated from performing his or her usual duties, the board must consider both a job description and a list of job demands placed on an employee as well as the duties actually performed by the employee. (*Hosford v. Bd. of*

³ The applicant in *Mansperger* was a game warden with peace officer status. His duties included patrolling specified areas to prevent violations and to apprehend violators; issuing warnings and serving citations; and serving warrants and making arrests. He suffered injury to his right arm while arresting a suspect. There was evidence that Mansperger could shoot a gun, drive a car, swim, row a boat (but with some difficulty), pick up a bucket of clams, pilot a boat, and apprehend a prisoner (with some difficulty). He could not lift heavy weights or carry the prisoner away. The court noted that although the need for physical arrests did occur in Mansperger's job, they were not common occurrences for a fish and game warden. (*Id.* at p. 877.) Similarly, the need for him to lift a heavy object alone was determined to be a remote occurrence. (*Ibid.*) In holding the applicant was not incapacitated for the performance of his duties, the court noted the activities he was unable to perform were not common occurrences and he could otherwise "substantially carry out the normal duties of a fish and game warden." (*Id.* at p. 876.)

Administration (1977) 77 Cal.App.3d 854, 860-861⁴; *Beckley v. Board of Administration* (2013) 222 Cal.App.4th 691, 699.) Moreover, the employee must be presently incapacitated; that disability might occur in the future due to aggravation of the condition or disability that is a prospective probability does not satisfy the requirements of the Government Code. (*Id.* at p. 863; *Wolfman v. Board of Trustees* (1983) 148 Cal.App.3d, 196.) The above-referenced appellate authority is also discussed thoroughly in several precedential decisions.⁵ (*In the Matter of the*

⁴ In *Hosford*, the court held that in determining whether an individual was substantially incapacitated from his usual duties, the courts must look to the duties actually performed by the individual, and not exclusively at job descriptions. *Hosford*, a California Highway Patrol Officer, suffered a back injury lifting an unconscious victim. In determining eligibility for a disability retirement, the court evaluated *Hosford*'s injuries according to the job duties required as a sergeant, as well as the degree to which any physical problem might impair the performance of his duties. Thus, the actual and usual duties must be the criteria upon which any impairment is judged. Generalized job descriptions and physical standards are not controlling, nor are actual but infrequently performed duties to be considered. The *Hosford* court found although *Hosford* suffered some physical impairment, he could still substantially perform his usual duties. The court rejected *Hosford*'s contention that he was substantially incapacitated from performing his usual and customary duties because his medical conditions created an increased risk of future injury.

⁵ An agency may designate a decision as precedential authority that may be relied upon in future decisions if it contains a significant legal or policy determination of general application that is likely to recur.

Application for Reinstatement from Industrial Disability Retirement of Willie Starnes and Department of California Highway Patrol, Case No. 2530, OAH No. L-1999060537, effective January 22, 2000; In the Matter of the Application for Disability Retirement of Theresa V. Hasan and Department of Corrections [Parole and Community Services Division, Region II], Case No. 2704, OAH No. N-1999100099, effective April 21, 2000; In the Matter of the Application for Disability Retirement of Ruth A. Keck and Los Angeles County Schools [Glendora Unified School District], Case No. 3138, OAH No. L-19991200097, effective September 29, 2000.)

Competent Medical Opinion

10. CalPERS makes its determination whether a member is disabled for retirement purposes based upon "competent medical opinion." That determination is based on evidence offered to substantiate the member's disability. (*Lazan v. County of Riverside* (2006) 140 Cal. App. 4th 453, 461, distinguished on other grounds.)

11. Evidence Code section 801 states:

If a witness is testifying as an expert, his testimony in the form of an opinion is limited to such an opinion as is:

(a) Related to a subject that is sufficiently beyond common experience that the opinion of an expert would assist the trier of fact; and

(b) Based on matter (including his special knowledge, skill, experience, training, and education) perceived by or personally known to the witness or made known to him at or before the hearing, whether or not admissible, that is of

a type that reasonably may be relied upon by an expert in forming an opinion upon the subject to which his testimony relates, unless an expert is precluded by law from using such matter as a basis for his opinion.

12. The determinative issue in each case must be whether the witness has sufficient skill or experience in the field so that his testimony would be likely to assist the trier of fact in the search for the truth, and "no hard and fast rule can be laid down which would be applicable in every circumstance." (*Mann v. Cracchiolo* (1985) 38 Cal.3d 18, 37-38.)

13. A properly qualified expert may offer an opinion relating to a subject that is beyond common experience, if that expert's opinion will assist the trier of fact but the expert's opinion may not be based on assumptions of fact that are without evidentiary support or based on factors that are speculative or conjectural, for then the opinion has no evidentiary value and does not assist the trier of fact. (*Brown v. Ransweiler* (2009) 171 Cal.App.4th 516, 529-530.)

14. Government Code section 11513, subdivision (d), states, in part: "Hearsay evidence may be used for the purpose of supplementing or explaining other evidence but over timely objection shall not be sufficient in itself to support a finding unless it would be admissible over objection in civil actions."

15. Unless admissible over objection in civil actions, hearsay evidence shall not be sufficient in itself to support a finding in an administrative proceeding. (*Carl S. v. Commission for Teacher Preparation & Licensing* (1981) 126 Cal.App.3d 365,371.) Hearsay evidence is not competent evidence that can independently support a finding. (*McNary v. Department of Motor Vehicles* (1996) 45 Cal.App.4th 688.)

16. Determining both the nature of R.S.'s psychiatric conditions, and whether any of those conditions incapacitated her from the performance of her duties, is sufficiently beyond common experience such that expert testimony is required. R.S.'s treatment provider(s) did not testify or offer written reports in this case. Rather, the session records by Dr. Bastien were reviewed by Dr. Carroll, and he provided a summary of those records. As such, the summary of Dr. Bastien's session records was received as administrative hearsay, and the summary was only considered to the extent it supplemented and/or explained other non-hearsay evidence.

Evaluation

17. In order to qualify for disability retirement, R.S. must demonstrate with competent medical opinions that she was permanently disabled or substantially incapacitated, due to psychiatric conditions, from performing the usual and customary duties of a Senior Psychologist Specialist when she filed her application. Dr. Carroll ultimately concluded that R.S. was not incapacitated from performing her job duties as a result of any psychiatric conditions. R.S. offered no competent medical opinions to refute the opinion of Dr. Carroll. Thus, R.S. failed to meet her burden of proof and her application must be denied.

18. As discussed in *Mansperger, supra.*, an applicant is not incapacitated when he or she is able to perform their work duties – even if when doing so “may be difficult or painful.” While the fear R.S. attributes to her ex-boyfriend's actions is concerning and certainly supports R.S.'s desire not to return to the workplace, her fear of physically returning to Donovan because of the possibility that her ex-boyfriend will stalk her there is a speculative fear that does not qualify a person for disability retirement. R.S. has mild PTSD and is able to function by working as a private practice psychologist. She also provides care for her children. She was able to move to

Maryland for eight months, obtain her professional license and employment in Maryland, return to San Diego, and continue to maintain her employment in Maryland, via telework, for 30 hours a week. Hence, the findings demonstrate that she is able to perform the usual and customary functions of her position at Donovan and she is not incapacitated due to any psychiatric condition.

19. Based on the above, petitioner's determination that R.S. was not permanently disabled or incapacitated, due to psychiatric conditions, from performance of her duties is affirmed.

Cause Exists to Deny the Application

20. Cause exists to deny R.S.'s application for disability retirement based on psychiatric conditions. R.S. failed to establish by a preponderance of the evidence that she was permanently disabled or incapacitated from performing her usual and customary duties as a Senior Psychologist Specialist for Donovan/CDCR, based on psychiatric conditions (acute stress disorder), when she filed her application for disability retirement.

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ORDER

The application for disability retirement filed by R.S. for psychiatric conditions, with the California Public Employees' Retirement System on April 26, 2021, is denied. California Public Employees' Retirement System's denial of R.S.'s application, due to psychiatric conditions, is affirmed.

DATE: March 14, 2023



JAMI A. TEAGLE-BURGOS

Administrative Law Judge

Office of Administrative Hearings