

## WISCONSIN DEPARTMENT OF SAFETY AND PROFESSIONAL SERVICES



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Before the  
State Of Wisconsin  
Medical Examining Board

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In the Matter of the Disciplinary Proceedings  
Against Manuel J. Thomas, M.D. Respondent.

FINAL DECISION AND ORDER

Order No. **ORDER 0007649**

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Division of Legal Services and Compliance Case No. 20 MED 440

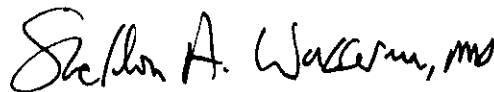
The State of Wisconsin, Medical Examining Board, having considered the above-captioned matter and having reviewed the record and the Proposed Decision of the Administrative Law Judge, make the following:

ORDER

NOW, THEREFORE, it is hereby ordered that the Proposed Decision annexed hereto, filed by the Administrative Law Judge, shall be and hereby is made and ordered the Final Decision of the State of Wisconsin, Medical Examining Board.

The rights of a party aggrieved by this Decision to petition the department for rehearing and the petition for judicial review are set forth on the attached "Notice of Appeal Information."

Dated at Madison, Wisconsin on the 20<sup>th</sup> day of October, 2021.



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Member  
Medical Examining Board



Before The  
**State of Wisconsin**  
**DIVISION OF HEARINGS AND APPEALS**

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In the Matter of Disciplinary Proceedings Against  
Manuel J. Thomas, M.D., Respondent

DHA Case No. SPS-21-0030  
DLSC Case No. 20 MED 440

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**PROPOSED DECISION AND ORDER**

The parties to this proceeding for purposes of Wis. Stat. §§ 227.47(1) and 227.53 are:

Manuel J. Thomas, M.D.  
c/o Attorney Patrick Knight  
Gimbel Reilly Guerin Brown LLP  
330 E. Kilbourn Ave., Suite 1170  
Milwaukee, WI 53202

Wisconsin Medical Examining Board  
P.O. Box 8366  
Madison, WI 53708-8366

Department of Safety and Professional Services,  
Division of Legal Services and Compliance, by:

Attorney Julie Zimmer  
Department of Safety and Professional Services  
Division of Legal Services and Compliance  
P.O. Box 7190  
Madison, WI 53707-7190

PROCEDURAL HISTORY

On April 28, 2021, the Department of Safety and Professional Services (Department), Division of Legal Services and Compliance (Division), filed a formal complaint alleging that Respondent Manuel J. Thomas, M.D., engaged in unprofessional conduct by violating a provision, condition, or term of a valid order of the Wisconsin Medical Examining Board (Board) and by practicing medicine without a license, in violation of Wis. Admin. Code § Med 10.03(1)(a) and Wis. Stat. § 448.03(1)(a); and, by prescribing a controlled substance as defined in Wis. Stat. § 961.01(4) other than in the course of legitimate professional practice or as otherwise permitted by law, in violation of Wis. Admin. Code § Med 10.03(2)(e). Administrative Law Judge Sally Pederson (ALJ) was assigned to the matter.

The Division served Respondent on April 28, 2021 by sending a copy of the Notice of Hearing and Complaint to Respondent's address on file with the Department via certified and regular first-class mail. The Division also sent a copy of the Notice of Hearing and Complaint to Respondent at two alternate addresses identified as associated with Respondent via certified and regular first-class mail and emailed a copy to Respondent's email address on file with the Department.

On May 4, 2021, the Division received the signed certified mail receipt from the U.S. Postal Service indicating that the Notice of Hearing and Complaint sent to Respondent at one of the alternate addresses was received by Respondent's agent on April 30, 2021.

Respondent was required to file an Answer within twenty days from the date of service, or by May 18, 2021. No Answer was filed by that date. On May 18, 2021, the ALJ received a letter from Respondent stating he was ill and asking for additional time to file an Answer. The Division did not object to the request, the ALJ issued an Order on May 19, 2021 extending the deadline for Respondent to file an Answer to June 7, 2021 and scheduling a telephone prehearing conference for June 10, 2021.

The ALJ sent written notice of the prehearing conference by U.S. mail to Respondent. The notice ordered Respondent to contact the ALJ no later than June 9, 2021 to provide his current telephone number. No Answer was filed by the extended deadline. On June 9, 2021, the ALJ received a letter from Respondent in which he stated that he was still ill and that Attorney Knight would "be taking care of this matter."

On June 10, 2021, Attorney Knight appeared at the telephone prehearing conference on behalf of Respondent and asked for an additional extension of time to file an Answer, stating he had not yet reviewed the Complaint. The Division moved for default based on Respondent's failure to file an Answer by the extended deadline. The ALJ denied the Division's motion and granted Respondent's request for additional time to file an Answer, noting that Respondent's license to practice medicine was currently suspended. The ALJ issued an Order extending the deadline for Respondent to file an Answer to June 30, 2021 and scheduled another telephone prehearing conference for July 1, 2021.

Respondent failed to file an Answer by the second extended deadline of June 30, 2021. On June 30, 2021, Attorney Knight informed the ALJ and the Division that he had been unable to get in touch with Respondent for at least two months and therefore lacked authorization to file an Answer on his behalf.

At the prehearing conference on July 1, 2021, the Division verbally moved for default based on Respondent's failure to file an Answer to the Complaint, pursuant to Wis. Admin. Code § SPS 2.14. After providing Attorney Knight the opportunity to respond to the Division's motion during the prehearing conference, the ALJ granted the Division's motion and issued a Notice of Default against Respondent. The ALJ ordered the Division to file a recommended proposed decision and order by July 30, 2021. The Division timely filed its submission.

Facts Related to the Alleged Violations

1. Respondent Manuel J. Thomas, M.D., is licensed in the state of Wisconsin to practice medicine and surgery, having license number 47171-20. Respondent's license was first issued on July 16, 2004 and is currently suspended as of October 21, 2020. (Complaint ¶ 1).

2. Respondent's address on file with the Department is 15985 Smith Drive, Brookfield, Wisconsin 53005. Respondent's email address on file with the Department is [mthomasc@hotmail.com](mailto:mthomasc@hotmail.com). (Complaint ¶ 2).

3. As of December 7, 2020, Respondent's address was reported by the U.S. Postal Service to be P.O. Box 1116, Brookfield, Wisconsin 53008-1116. As of March 22, 2021, Court records (CCAP) listed Respondent's address as 1337 Canterbury Circle, Brookfield, Wisconsin 53005.<sup>1</sup> (Complaint ¶ 3).

4. On October 21, 2020, the Board issued Final Decision and Order No. 7046 (Order) suspending Respondent's license to practice medicine and surgery in Wisconsin.<sup>2</sup> The Order approved and adopted the Proposed Decision and Order issued by Administrative Law Judge Kristin Fredrick in DHA Case No. SPS-20-0016<sup>3</sup> wherein ALJ Fredrick found, after default judgment was entered, that Respondent failed to cooperate with the Board's seven investigations and practiced medicine without an active license or registration. (Complaint ¶ 4).

5. On October 22, 2020, the Division sent a copy of the Order to Respondent at his address on file with the Department via regular U.S. mail and published the Order on the Department's website. The Order was returned to sender by the U.S. Postal Service with a forwarding address. On December 17, 2020, the Department resent the Order to Respondent at the forwarding address: P.O. Box 1116, Brookfield, Wisconsin, 53008-1116. (Complaint ¶ 5).

6. On November 17, 2020, the Department received a complaint from Pharmacist A reporting that Clinica Latina Pharmacy had received electronic and written prescriptions issued by Respondent after his license was suspended. When Pharmacist A followed up with Respondent, he said his license was not suspended and the Department's website had not been updated. (Complaint ¶ 6).

7. Pharmacist A provided the Department with a copy of 65 prescriptions written by Respondent to patients between October 21, 2020 and November 11, 2020, including prescriptions for controlled substances. (Complaint ¶ 7).

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<sup>1</sup> See Dane County Circuit Court Case No. 2020CF002899.

<sup>2</sup> A copy of the Order was attached to the Complaint as Division Exhibit A.

<sup>3</sup> Division Case Nos. 17 MED 338, 18 MED 053, 19 MED 016, 19 MED 142, 19 MED 212, 19 MED 533, and 19 MED 552.

8. On December 3, 2020, the Department received a complaint from Pharmacist B reporting that over 120 prescriptions written by Respondent had been received at multiple Aurora Pharmacy locations after his license was suspended. (Complaint ¶ 8).

9. Pharmacist B provided the Department with a copy of 110 prescriptions written by Respondent to patients between October 21, 2020 and November 19, 2020, including prescriptions for controlled substances. (Complaint ¶ 9).

10. On March 1, 2021, the Department received a complaint from United Healthcare Community Plan of Wisconsin reporting that Respondent had issued at least eight prescriptions to one of its members after his license was suspended, one of which was for Morphine Sulphate ER. Several of the prescriptions were filled at Union Serv U Pharmacy in Milwaukee, Wisconsin. (Complaint ¶ 10).

11. Union Serv U Pharmacy provided the Department with a copy of 170 prescriptions written by Respondent to patients between October 21, 2020 and November 18, 2020, including prescriptions for controlled substances. (Complaint ¶ 11).

12. On December 1, 2020, the Division emailed Respondent at his email address on file with the Department requesting his response to the allegations that he prescribed medication to patients after his license was suspended. Respondent did not respond. (Complaint ¶ 12).

13. On January 6, 2021, the Division emailed Respondent again at his email address on file with the Department requesting his response to the allegations. Respondent did not respond. (Complaint ¶ 13).

14. On January 6, 2021, the Division sent a letter to Respondent at his address on file with the Department via regular U.S. mail requesting a response to the allegations. On January 8, 2021, the letter was returned to the Division by the U.S. Postal Service.

#### Facts Related to Default

15. On April 28, 2021, the Division served the Notice of Hearing and Complaint on Respondent at his last known address on file with the Department by both certified and regular first-class mail. (Affidavit of Service ¶ 3(a) and (b)).

16. On April 28, 2021, the Division also served the Notice of Hearing and Complaint on Respondent at two alternate addresses identified as associated with Respondent (referred to in paragraph 3 above) via certified and regular first-class mail. (Affidavit of Service ¶ 3(c) – (f)).

17. On April 28, 2021, the Division also emailed a copy of the Notice of Hearing and Complaint to Respondent at his last known email address on file with the Department. (Affidavit of Service ¶ 4).

18. On May 4, 2021, the Division received the signed certified mail receipt from the U.S. Postal Service indicating that the Notice of Hearing and Complaint sent to Respondent at 1337 Canterbury Circle, Brookfield, Wisconsin 53005 was received by Respondent's agent on April 30, 2021. (Affidavit of Service ¶ 5; Division Exhibit 1).

19. Respondent failed to file an Answer to the Complaint by May 18, 2021.

20. On May 18, 2021, the ALJ received a letter from Respondent stating he was ill and asking for additional time to file an Answer. Without objection from the Division, the ALJ issued an Order on May 19, 2021, extending the deadline for Respondent to file an Answer to June 7, 2021 and scheduling a telephone prehearing conference for June 10, 2021. The ALJ sent written notice of the prehearing conference by U.S. mail to Respondent. The notice ordered Respondent to contact the ALJ no later than June 9, 2021 to provide his current telephone number.

21. Respondent failed to file an Answer to the Complaint by June 7, 2021. On June 9, 2021, the ALJ received a letter from Respondent in which he stated that he was still ill and that Attorney Knight would "be taking care of this matter."

22. On June 10, 2021, Attorney Knight appeared at the telephone prehearing conference on behalf of Respondent and asked for an additional extension of time to file an Answer, stating he had not yet reviewed the Complaint. The Division moved for default based on Respondent's failure to file an Answer by the extended deadline. The ALJ denied the Division's motion and granted Respondent's request for additional time to file an Answer, noting that Respondent's license to practice medicine was currently suspended. The ALJ issued an Order extending the deadline for Respondent to file an Answer to June 30, 2021 and scheduled another telephone prehearing conference for July 1, 2021.

23. Respondent failed to file an Answer to the Complaint by June 30, 2021. On June 30, 2021, Attorney Knight informed the ALJ and the Division that he had been unable to reach the Respondent for at least two months and therefore lacked authorization to file an Answer on his behalf.

24. At the prehearing conference on July 1, 2021, the Division verbally moved for default based on Respondent's failure to file an Answer to the Complaint, pursuant to Wis. Admin. Code § SPS 2.14. The ALJ allowed Attorney Knight the opportunity to respond to the Division's motion during the prehearing conference. On July 1, 2021, the ALJ granted the Division's motion and issued a Notice of Default against Respondent. The ALJ ordered the Division to file a recommended proposed decision and order by July 30, 2021.

25. The Division timely filed a Recommended Proposed Decision and Order.

## DISCUSSION

### Jurisdictional Authority

Pursuant to Wis. Admin. Code § SPS 2.10(2), the undersigned ALJ has authority to preside over this disciplinary proceeding in accordance with Wis. Stat. § 227.46(1). The Board has the authority to impose discipline against the Respondent pursuant to Wis. Stat. § 448.02(3).

### Default

The Division properly served the Notice of Hearing and Complaint upon Respondent by mailing copies to him at his last known address on file, in accordance with Wis. Stat. § 440.11(2). Pursuant to Wis. Admin. Code § SPS 2.08(1), service by mail is complete upon mailing.

An answer to a complaint must be filed within 20 days from the date of service of the complaint. Wis. Admin. Code § 2.09(4). If a respondent fails to answer within 20 days as required by statute or fails to appear at a scheduled prehearing or hearing, the respondent is in default and the disciplinary authority may make findings and enter an order on the basis of the complaint and other evidence. Wis. Admin. Code § SPS 2.14.

Here, Respondent failed to file an Answer to the Complaint within 20 days from the date of service and also failed to do so by the two extended deadlines granted by the ALJ. Therefore, Respondent is in default and findings may be made, and an order may be entered, on the basis of the Complaint.

### Violations

If a licensed physician is found guilty of unprofessional conduct after an investigation and disciplinary hearing, the Board may “suspend or revoke any license or certificate granted by the board to that person.” Wis. Stat. § 448.02(3)(c).

Under Wis. Admin. Code § Med 10.03, “unprofessional conduct” for physicians includes, but is not limited to, the following:

(1) Dishonesty and Character:

- (a) Violating or attempting to violate ch. 448, Stats., or any provision, condition, or term of a valid rule or order of the board.

(2) Direct Patient Care Violations:



(e) Administering, dispensing, prescribing, supplying, or obtaining a controlled substance as defined in s. 961.01(4), Stats., other than in the course of legitimate professional practice, or as otherwise permitted by law.

In the instant case, the Board suspended Respondent's license to practice medicine and surgery on October 21, 2020, when it issued Order No. 7046, which was published on the Department's website and sent to Respondent at his last known address on file with the Department, pursuant to Wis. Stat. § 440.11(2). Between October 21, 2020 and November 19, 2020, Respondent practiced medicine without a license by issuing at least 345 prescriptions to patients after his license was suspended. Accordingly, Respondent committed unprofessional conduct as defined by Wis. Admin. Code § Med 10.03(1)(a) by violating Wis. Stat. § 448.03(1)(a), which provides that "No person may practice medicine and surgery, or attempt to do so or make a representation as authorized to do so, without a license to practice medicine and surgery granted by the Board."

In addition, Respondent committed unprofessional conduct as defined by Wis. Admin. Code § Med 10.03(1)(a) by violating a provision, condition, or term of Board Order No. 7046, which indefinitely suspended Respondent's license to practice medicine and surgery in Wisconsin. Board Order No. 7046 allowed Respondent to petition the Board for a stay of the suspension contingent on various conditions, but Respondent never petitioned the Board for a stay nor complied with those conditions. Thus, Respondent's license has been continuously suspended since October 21, 2020. By practicing medicine and issuing prescriptions with a suspended license, Respondent violated Board Order No. 7046.

Respondent also engaged in unprofessional conduct as defined by Wis. Admin. Code § Med 10.03(2)(e) by prescribing controlled substances as defined in s. 961.01(4), Stats., other than in the course of legitimate professional practice, or as otherwise permitted by law. According to the undisputed facts, Respondent issued at least 345 prescriptions to patients after his license was suspended, including prescriptions for controlled substances. One prescription issued by Respondent after his license was suspended was for Morphine Sulphate ER. Morphine Sulphate ER contains morphine, which is a Schedule II controlled substance under Wis. Stat. § 961.16(2)(a). No Schedule II controlled substance may be dispensed without a prescription issued by a "practitioner," the definition of which includes a physician "licensed, registered, certified or otherwise permitted to distribute...a controlled substance in the course of professional practice or research in this state." Wis. Stat. §§ 961.01(19)(a) and 961.38(1r). Respondent did not meet the definition of a practitioner after October 21, 2020 and, therefore, committed unprofessional conduct by unlawfully prescribing controlled substances after that date.

By engaging in the conduct described above, Respondent committed unprofessional conduct as defined in Wis. Admin. Code §§ Med 10.03(1)(a) and (2)(e) and, consequently, is subject to discipline pursuant to Wis. Stat. § 448.02(3)(c).

### Discipline

The Division recommended that Respondent's license to practice medicine and surgery in Wisconsin be revoked, pursuant to the terms and conditions of the Order below.

The three purposes of discipline in a professional misconduct case are: (1) to promote the rehabilitation of the credential holder; (2) to protect the public from other instances of misconduct; and (3) to deter other credential holders from engaging in similar conduct. *See State v. Aldrich*, 71 Wis. 2d 206, 209, 237 N.W.2d 689 (1976).

The recommended discipline is consistent with the purposes articulated in *Aldrich*. Respondent engaged in very serious misconduct by practicing medicine without a license, violating a prior Board Order, and unlawfully prescribing controlled substances other than in the course of legitimate professional practice. The Board suspended Respondent's license on October 21, 2020 for refusing to cooperate with the Board's investigations of seven different cases involving allegations of inappropriate prescribing of controlled substances and issuing prescriptions to patients without a license. After his license was suspended, Respondent continued to exhibit the same behaviors in direct violation of the Board's Order. He has repeatedly shown a blatant disregard for the Board's authority and for the law.

Revoking Respondent's license protects the public and deters other physicians from engaging in similar conduct. The Wisconsin Supreme Court has acknowledged that "the purpose of licensing statutes is not to benefit those persons licensed to practice under the statutes, but rather to protect the public by the requirement of a license as a condition precedent to practicing in a given profession. The granting of a license pursuant to such a statute has been characterized as a privilege." *Gilbert v. State Medical Examining Board*, 119 Wis. 2d 168, 188, 349 N.W. 2d 68 (1984). "Such statutes are grounded in the state's police power to protect the public welfare through safeguarding the life, health, and property of its citizens." *Id.* "Protection of the public is the purpose of requiring a license." *State ex rel. Green v. Clark*, 235 Wis. 628, 631, 294 N.W. 25 (1940).

Respondent repeatedly disregarded the Board's authority and the laws intended to protect public health and welfare, thereby demonstrating that he cannot be trusted to practice medicine safely and lawfully in Wisconsin. He potentially endangered public safety by continuing to prescribe controlled substances to his patients after his license was suspended. Moreover, Respondent practiced medicine without a license, eschewing Board oversight and regulation. By not answering to Board authority, Respondent's competency and his prescribing practices were unchecked and his patients and the public were put at risk. Unfortunately, suspending Respondent's medical license failed to stop his inappropriate behavior. At this point, revoking his license is necessary to protect patients and the public and to deter other physicians from engaging in similar conduct.

Board Order No. 7064 suspended Respondent's medical license but granted him the opportunity to petition to stay the suspension and continue practicing subject to certain

conditions. However, instead of recognizing the Board's authority and its important role of protecting patients and the public, Respondent continued to ignore the Board and prescribed controlled substances without a valid license. Respondent squandered the opportunity to rehabilitate his practice; consequently, the Board must now take stronger action to protect patients and the public and deter other physicians from engaging in similar conduct by revoking Respondent's medical license.

The recommended discipline is consistent with Board precedent. In *In the Matter of Disciplinary Proceedings Against Michael N. Mangold, M.D.*, Order Number 0002829 (December 9, 2013),<sup>4</sup> the Board adopted the administrative law judge's proposed decision and order but issued a variance in regard to the discipline ordered. The judge had proposed a suspension for failing to maintain patient healthcare records after a default judgment was entered. However, the facts indicated that Dr. Mangold had been previously reprimanded for similar conduct and then suspended for failing to comply with the Board's order and for practicing medicine without a license. The Board decided to revoke Dr. Mangold's license:

It is the opinion of this Board that to date, discipline meted out by this Board has not served to rehabilitate the Respondent nor protect the public. Respondent's failure to participate during these proceedings provides further evidence of his lack of rehabilitation and clear disregard for the Board's authority. Simply put, the Board is not convinced that another suspension would serve to protect the public or rehabilitate the Respondent. Moreover, his blatant disregard for the Board's authority, if not tempered, may invite others to engage in similar conduct. License revocation is the ultimate means, within the Board's power, of protecting the public. See Wis. Stat. § 448.02(3). An essential purpose of a credentialing statute is to protect the public. See *Strigenz v. Department of Regulation and Licensing*, 103 Wis. 2d 281, 286-287, 307 N.W. 2d 664 (1981). As such, the next logical step, in order to promote the three purposes of discipline, is revocation of the Respondent's license to practice medicine and surgery.

See also *In the Matter of Disciplinary Proceedings Against Ted Kobashigawa, M.D.*, Order Number LS9910212MED (January 19, 2000) (physician's Wisconsin license was revoked following the revocation of his California license for prescribing drugs without medically examining patients, fraudulently billing for services not performed for which he was criminally convicted and failing to maintain proper patient healthcare records).<sup>5</sup>

Based upon the facts of this case, Respondent's prior discipline, and the factors set forth in *Aldrich*, revoking Respondent's medical license is reasonable and warranted.

<sup>4</sup> See the Order at <https://online.drl.wi.gov/decisions/2013/ORDER0002829-00009127.pdf>.

<sup>5</sup> See the Order at <https://online.drl.wi.gov/decisions/1999/LS9910212MED-00068141.pdf>.

Costs

The Board is vested with discretion concerning whether to assess all or part of the costs of this proceeding against Respondent. *See* Wis. Stat. § 440.22(2). In exercising such discretion, the Board must look at aggravating and mitigating facts of the case; it may not assess costs against a licensee based solely on a "rigid rule or invocation of an omnipresent policy," such as preventing those costs from being passed on to others. *Noesen v. State Department of Regulation & Licensing, Pharmacy Examining Board*, 2008 WI App 52, ¶¶ 30-32, 311 Wis. 2d 237, 751 N.W.2d 385. In previous orders, Boards have considered the following factors when determining if all or part of the costs should be assessed against the Respondent: (1) the number of counts charged, contested and proven; (2) the nature and seriousness of the misconduct; (3) the level of discipline sought by the prosecutor; (4) the Respondent's cooperation with the disciplinary process; (5) prior discipline, if any; (6) the fact that the Department is a program revenue agency, funded by other licensees; and (7) any other relevant circumstances. *See In the Matter of Disciplinary Proceedings Against Elizabeth Buenzli-Fritz*, LS0802183CHI (Aug. 14, 2008). It is within the Board's discretion as to which of these factors to consider, whether other factors should be considered, and how much weight to give any factors considered.

Considering the above factors, it is appropriate for Respondent to pay the full costs of the investigation and of this proceeding. Respondent defaulted and the factual allegations identified in the complaint were deemed admitted. Respondent failed to cooperate with the Board's investigation after repeated attempts to contact him. Finally, Respondent failed to file an Answer to the Complaint after two extended deadlines and failed to provide any argument or defense regarding the allegations against him.

The Department is a program revenue agency whose operating costs are funded by the revenue received from credential holders. It would be unfair to impose the costs of pursuing discipline in this matter on those licensees who have not engaged in misconduct. Therefore, it is appropriate for Respondent to pay the full costs of the investigation and this proceeding, as determined pursuant to Wis. Admin. Code § SPS 2.18.

ORDER

For the reasons set forth above, IT IS ORDERED that:

1. The license and registration to practice medicine and surgery in the state of Wisconsin issued to Respondent Manuel J. Thomas, M.D. (license number 47171-20) is hereby REVOKED.
2. As of the date of this Order, Respondent shall not engage in the practice of medicine and surgery in any capacity in the state of Wisconsin.
3. Respondent shall pay all recoverable costs in this matter in an amount to be established pursuant to Wis. Admin. Code § SPS 2.18. After the amount is established, payment shall be

made by certified check or money order payable to the Wisconsin Department of Safety and Professional Services and sent to the address below:

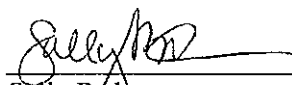
Department Monitor  
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Telephone (608) 266-2112; Fax (608) 266-2264  
[DSPSMonitoring@wisconsin.gov](mailto:DSPSMonitoring@wisconsin.gov)

4. The terms of this Order are effective the date the Final Decision and Order in this matter is signed by the Board.

Dated at Madison, Wisconsin, on September 1, 2021

STATE OF WISCONSIN  
DIVISION OF HEARINGS AND APPEALS  
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By: \_\_\_\_\_

  
Sally Pederson,  
Senior Administrative Law Judge