

INTERMEDIATE COURT OF APPEALS OF WEST VIRGINIA

NO. 25-ICA-369

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**Charleston Area Medical Center, Inc.,
Petitioner Below, Petitioner,**

v.

**Thomas Memorial Hospital Association
d/b/a/ Thomas Memorial Hospital,
Applicant Below, Respondent,**

and

**West Virginia Health Care Authority,
Respondent.**

**RESPONSE BRIEF ON BEHALF OF
WEST VIRGINIA HEALTH CARE AUTHORITY**

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INTRODUCTION

Petitioner, Charleston Area Medical Center (“CAMC”), tries to appeal a determination of the West Virginia Health Care Authority (“the Authority”). The Authority concluded that Thomas Memorial Hospital (“TMH”) did not violate the certificate of need (“CON”) law at a facility in Teays Valley, WV; the Authority thus declined to further investigate. CAMC—the complainant who initiated the investigation—disagrees and seeks to overturn that judgment.

This appeal must fail due to this Court’s lack of jurisdiction and CAMC’s lack of standing. The Authority’s choice not to further investigate a potential CON violation is unappealable. And though CAMC involved itself in the process by sending unsolicited letters to the Authority, it was never an actual party to what happened below. Thus, the Court should dismiss this appeal.

STATEMENT OF THE CASE

By letter dated August 15, 2024, CAMC requested that the Authority investigate TMH to determine if it was violating the CON laws by developing a new health care facility in Teays Valley, West Virginia, located at 4004 State Route 34, Hurricane, West Virginia. D.R. 0002, 0107. CAMC specifically alleged that the Teays Valley location of TMH had been inactive and that TMH had effectively abandoned its previously issued CON. It asserted that TMH had not offered services at the Teays Valley location for many years in violation of West Virginia Code § 16-2D-8(12). *See id.* (requiring a new CON application for . . . “[t]he addition of health services . . . not offered on a regular basis by or on behalf of the health care facility within the 12-month period prior to the time the services would be offered.”).

In its complaint letter, CAMC also requested to be designated as an affected party pursuant to West Virginia Code § 16-2D-2(1)(E). The Authority did not respond to that request. Indeed, the

Authority never granted CAMC affected party status because the matter only involved an investigation of a complaint. D.R. 0002, 0106.

The Authority thus notified TMH of the CAMC letter and started investigating whether the facility had been offering services regularly over the previous twelve months. D.R. 105. As part of that investigation, THM provided the Authority with specific patient utilization data relating to the Teays Valley location. Because the Authority believed the patient utilization data could potentially contain protected health information (PHI), and because the information was also proprietary commercial information, TMH and the Authority agreed to a protective order covering the data. D.R. 0094.

After additional correspondence and investigation, the Authority eventually concluded that no violation had occurred. In so finding, the Authority determined that “at no time has the Teays Valley Location ceased all operations for twelve (12) months” or have they “performed any health care service which they are not currently authorized to offer.”¹ D.R. 0100. While the Authority voted on this finding at its meeting on August 13, 2025, the Board “issued” its “final decision” on August 28, 2025. D.R. 0100. At no time did the Authority initiate a determination of reviewability proceeding or any other formal proceeding under the CON law.

This appeal followed. Though not expressly stated, CAMC has evidently assumed that it may appeal under West Virginia Code § 16-2D-16(a), which grants an “affected party” the ability to “appeal the authority’s final decision in a CON review.”

¹ After the CAMC complaint letter, the Authority received a Determination of Reviewability (“DOR”) request from TMH for the replacement of a linear accelerator at the same Teays Valley location. The Authority determined that THM was required to obtain a new CON to provide this service, as TMH had not operated the existing linear accelerator over the previous twelve months.

SUMMARY OF THE ARGUMENT

West Virginia Code § 16-2D-16(a) provides that “[a]n *applicant or an affected person* may appeal the authority’s final decision *in a certificate of need review* to the [Board of Review].” (emphasis added). Both required elements are missing here.

First, CAMC improperly characterizes the underlying matter as a contested case proceeding in a continued attempt to achieve affected party status. It believes it should be allowed to participate and receive information as if this investigation was a routine CON application review. However, the underlying matter was not an appealable CON application review and never proceeded beyond the investigatory stage. And, critically, CAMC never achieved affected party status in the underlying proceeding because there is no statutory authority to give it that designation. Thus, CAMC does not have standing to appeal as an affected party.

Second, even if CAMC had standing to appeal, this Court is without jurisdiction. West Virginia Code § 16-2D-16(a) permits appellate review of only the Authority’s final decision in a CON review. No such review has occurred here.

For either or both of these reasons, this Court should dismiss this matter.

STATEMENT REGARDING ORAL ARGUMENT AND DECISION

This case raises no substantial questions of law, and Petitioner fails to identify any prejudicial error. Consequently, oral argument is not necessary, and a memorandum decision affirming the ruling below is appropriate. *See* R. App. Proc. 21.

STANDARD OF REVIEW

The standard of review for decisions appealed from the Authority is set forth in West Virginia Code § 16-2D-16 which provides, in pertinent part, that an appeal be processed “in accordance with the provisions governing the judicial review of contested administrative cases in article five, chapter twenty-nine-a of this code.” *See also Princeton Cmty. Hosp. v. State Health*

Plan., 174 W. Va. 558, 328 S.E.2d 164 (1985). The specific standard of review is found at West Virginia Code § 29A-5-4(g), which provides:

(g) The court may affirm the order or decision of the agency or remand the case for further proceedings. It shall reverse, vacate, or modify the order or decision of the agency if the substantial rights of the petitioner or petitioners have been prejudiced because the administrative findings, inferences, conclusions, decision, or order are

- (1) In violation of the constitutional or statutory provision;
- (2) In excess of the statutory authority or jurisdiction of the agency;
- (3) Made upon unlawful procedures;
- (4) Affected by other error of law;
- (5) Clearly wrong in view of the reliable, probative and substantial evidence of the whole record; or
- (6) Arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

See Syl. Pt. 2, *Shepherdstown Volunteer Fire Dep't v. State ex rel. State of W. Va. Hum. Rts. Comm'n*, 172 W. Va. 627, 309 S.E.2d 342 (1983).

Under the Administrative Procedures Act, “the task of the circuit court is to determine whether the [agency’s] decision was based on a consideration of the relevant factors and whether there has been a clear error of judgment.” *Frymier-Halloran v. Paige*, 193 W. Va. 687, 695, 458 S.E.2d 780, 788 (1995) (quoting *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 91 S.Ct. 814, 28 L.Ed.2d 136 (1971)). Interpreting a statute or an administrative rule or regulation presents a purely legal question subject to *de novo* review. *Appalachian Power Co. v. State Tax Dep't of W. Va.*, 195 W. Va. 573, 466 S.E.2d. 424 (1995). “An inquiring court—even a court empowered to conduct *de novo* review—must examine a regulatory interpretation of a statute by standards that include appropriate deference to agency expertise and discretion.” *Id.* at 582, 466 S.E.2d at 433. Under existing precedent, deference should only be given to an agency’s construction of a statute or legislative rule if the legislative intent is not clear. *Chevron, U.S.A.*,

Inc. v. Nat. Res. Defense Council, Inc., 467 U.S. 837, 104 S. Ct. 2778, 81 L.Ed.2d 694 (1984); *Sniffin v. Cline*, 193 W. Va. 370, 374, 456, S.E.2d 451, 455 (1995).

An agency's interpretation of a statutory provision or regulation it is charged with administering is entitled to a high degree of deference. Courts must, however, reject administrative orders and rules that are contrary to legislative intent. *See W. Va. Health Care Cost Review Auth. v. Boone Mem. Hosp.*, 196 W. Va. 326, 335, 472 S.E.2d 411, 420 (1996).

ARGUMENT

I. This Court does not have jurisdiction because the underlying matter was only an investigation—not a contested case under the Administrative Procedures Act and West Virginia Code § 16-2D-16(a).

This Court does not have jurisdiction to issue a decision on the merits because the final order was not the result of a “contested case” under the West Virginia Administrative Procedures Act (“the Act”). West Virginia Code § 29A-5-4(a) provides a mechanism of *judicial review* of *contested* cases. But this matter is not a contested case.

None of the elements of a contested case are found here. In *State ex rel. Frazier v. Thompson*, 243 W. Va. 46, 842 S.E.2d 250 (2020), the Supreme Court of Appeals of West Virginia concluded that, for a matter to be classified as a “contested case,” “an administrative agency [must] hold a hearing and issue a decision.” *Id.*, 243 W. Va. at 53, 842 S.E.2d at 257. Thus, where there was no hearing, there was no “contested case” from which a party could appeal; the Court only has jurisdiction under the Act to review only “contested cases.” *Id.*, 243 W. Va. at 54, 842 S.E.2d at 258. That is likewise true here. A hearing was never conducted and a decision on the merits was never issued; the Authority simply memorialized how it found that the complaint was without merit. No “legal rights, duties, interests or privileges of specific parties” were determined. *State ex rel. Joe Miller v. McGraw*, No. 12-0380, 2012 WL 3155761, at *3 (W. Va. May 30, 2012) (memorandum decision) (quoting W. Va. Code § 29A-1-2(b)); *see also, e.g., State ex rel. Dale v.*

Divita, No. 11-1726, 2013 WL 2131056, at *2 (W. Va. May 16, 2013) (memorandum decision) (holding that a request that an agency take certain action that was unaccompanied by an “attendant requirement for a hearing” is not a contested case).

As such, this Court is without jurisdiction to review this matter.

In addition, this Court is only vested with the authority to review certain *final* decisions of the Authority. “An applicant or an affected person may appeal the authority’s final decision *in a certificate of need review*.” W. Va. Code § 16-2D-16(a) (emphasis added). This limited right to appeal is further evidenced by the fact that this code section, prior to 2017, provided that an affected person may appeal a final decision of the state agency, while the present version of the statute specifically limits appeals to “final decision in a certificate of need review.” *Id.* The “decision” from which CAMC seeks relief is a decision closing a complaint and not a final decision *in a CON review*. CON reviews, for instance, follow prescribed processes and procedures that were not implicated here (nor could they be, as they are triggered by an “application”). *See generally* W. Va. Code § 16-2D-13; *see also id.* § 16-2D-12 (providing “minimum criteria” for CON reviews, none of which would be implicated here). Thus, this Court lacks jurisdiction to review this matter for this reason as well.²

CAMC also lacks standing to challenge the Authority’s determination that no violation occurred because it is neither a party nor an affected party. In the context of the Administrative Procedures Act, the Supreme Court of Appeals of West Virginia has determined that only those who are afforded the responsibilities, rights, and privileges of being a party to the underlying

² CAMC has the burden of establishing jurisdiction, and it has only invoked Section 16-2D-16 here. For instance, West Virginia Code § 51-11-4(b)(4) does not apply here because orders from the Authority were not formerly appealable to the Circuit Court of Kanawha County, but rather to the Office of Judges. *See* W. Va. Code § 51-11-4(b)(4); *see also* W. Va. Code § 16-2D-16. Nor did the Authority indicate that this is a “binding” declaratory ruling “after argument.” W. Va. Code § 29A-4-1.

proceeding have “standing to appeal an adverse administrative decision.” *Carte v. Cline*, 200 W. Va. 162, 166, 488 S.E.2d 437, 441 (1997). Clearly, this standard is not met with respect to CAMC’s limited involvement in this matter. While both CAMC and TMH provided certain information to the Authority during the investigation, and CAMC made extra-statutory demands of the Authority, D.R. 0033, CAMC is not a party-in-fact, nor has it achieved affected party status. No statute contemplates “affected party” status in the context of an investigation. *See, e.g.*, W. Va. Code Ann. § 16-2D-18 (describing processes for evaluating potential violations of CON laws and omitting any reference to an “affected party” status). Although CAMC invoked West Virginia Code § 16-2D-2(1)(E), that statute is merely a definitional provision for “affected party.”

Federal law further supports the premise that agency decisions to either institute an investigation or bring charges following the conclusion of an investigation are not reviewable on appeal unless specifically authorized by statute. An agency’s refusal to institute investigative or enforcement proceedings is generally unreviewable. *See Heckler v. Chaney*, 470 U.S. 821, 105 S.Ct. 1649, 84 L.Ed.2d 714 (1985); *see also Dep’t of Com. v. New York*, 588 U.S. 752, 139 S.Ct. 2551, 204 L.Ed.2d 978 (2019) (citing “a decision not to institute enforcement proceedings” as an example of an agency act “traditionally ... regarded as committed to agency discretion”) (cleaned up); *Stone v. Comm’r of Internal Revenue*, 86 F.4th 1320, 1327–28 (11th Cir. 2023) (same). This federal authority matters, as West Virginia courts have given weight to whether their approach is “consistent with that of the United States Supreme Court[’s]” approach to “the federal APA.” *State ex rel. W. Va. Bd. of Educ. v. Perry*, 189 W. Va. 662, 666, 434 S.E.2d 22, 26 (1993); *see also Citizens Bank of Weirton v. W. Va. Bd. of Banking & Fin. Institutions*, 160 W. Va. 220, 226, 233 S.E.2d 719, 724 (1977) (“The Federal and State administrative procedures acts were for all intents and purposes merely codifications of common law developments.”). So, this Court, too, should hold that a decision whether to institute an investigation or to bring charges in response to a particular complaint is a

decision committed to an agency’s discretion and presumptively unreviewable unless the Legislature says otherwise. *Peavey v. Holder*, 657 F. Supp. 2d 180, 193 (D.D.C. 2009). No statutory authority can be found here.

Even if the Authority had determined that a violation had occurred, West Virginia Code § 16-2D-18 would have only required the Authority to conduct a show-cause hearing. There, the entity accused of the violation—in this case, TMH—would have been given an opportunity to rebut the evidence and challenge the Authority’s initial finding. The statute does not recognize any pathway for a third party to participate or intervene in an investigatory proceeding before the Authority.

II. Based on the lack of jurisdiction in this matter, the remainder of CAMC’s arguments are without merit.

At bottom, CAMC takes issue with the Authority’s reading (and subsequent application in the investigatory context) of Section 16-2D-8(a)(12). But the fact that CAMC now alleges a misapplication of a statute does not, alone, give this Court jurisdiction to review the Authority’s determination that no violation of the CON laws occurred. Therefore, the issue of whether the Authority correctly applied Section 16-2D-8(a)(12) is not properly before this Court and should not be entertained. Entertaining this question in the absence of having the jurisdiction to do so would be tantamount to the issuance of an advisory opinion – and both this Court and the Supreme Court of Appeals of West Virginia has counseled that courts must refrain from issuing such opinions:

It is a deeply rooted and fundamental law that ‘this Court is not authorized to issue advisory opinions[.]’ *State ex rel. City of Charleston v. Coghill*, 156 W. Va. 877, 891, 207 S.E.2d 113, 122 (1973) (Haden J., dissenting). This Court further addressed the issue of advisory opinions in *Mainella v. Bd. of Trs. of Policemen's Pension or Relief Fund of City of Fairmont*, 126 W. Va. 183, 185-86, 27 S.E.2d 486, 487-88 (1943), as follows: Courts are not constituted for the purpose of making advisory decrees or resolving academic disputes. The pleadings and evidence must present a claim of legal right asserted by one party and denied by the other before jurisdiction of a suit may be taken. *State ex rel. Morrissey v. W. Va. Off. of Disciplinary Couns.*, 234 W. Va. 238, 246, 764 S.E.2d 769, 777 (2014).

Cummings v. Paine, 249 W. Va. 568, 574, 899 S.E.2d 646, 652 (Ct. App. 2024).

And CAMC’s argument that the Teay’s Valley location’s utilization data were subject to a protective order absent its third-party consent fails, too. Protective orders are a common and acceptable tool in a wide variety of settings. *See, e.g., State ex rel. State Farm Mut. Auto. Ins. Co. v. Bedell*, 228 W. Va. 252, 272, 719 S.E.2d 722, 742 (2011) (approving of protective orders to protect private health data). No statute requires the filing of a motion or specific factual findings to be made before confidentiality can be protected in the context of an administrative investigation. But more importantly, CAMC had no standing to object to the use of a protective order here. Again, CAMC was not a party to the case and it wasn’t an affected party, either. Nor can CAMC even argue that it was prejudiced by some lack of access to data. Although the Authority sealed utilization data from the Teays Valley location, D.R. 0103, multiple position letters from TMH, along with an affidavit of TMH CEO J. Gregory Rosencrance, M.D. D.R. 0090, were *not* sealed. CAMC then had enough information to submit exhaustive (and unsolicited) response letters of its own. *See, e.g.,* D.R. 0046-048, 0136-137, 0151-153. The data in the unsealed public record supports the Authority’s determination that no CON violation occurred.

CAMC finally asks that that this Court

conclude as a matter of law that the Authority erred when it decided that Thomas had not committed a violation at its regularly scheduled Board Meeting on August 13, 2025, but it did not issue a written Order outlining the reasons for the decision until on or about August 28, 2025.

The order itself clearly states in the final sentence that “the final decision in this Potential Violation was issued by the Health Care Authority on August 28, 2025.”

CAMC’s claim of prejudice is without merit. In its brief, CAMC states that “[p]ursuant to the statute and the State Regulation, the time to appeal begins when a party has notice of the decision” and then immediately admits they had actual notice of the decision on August 13. Pet’r’s Br. 17. But as evidenced by their brief, CAMC has been able to fully avail themselves of their right

to appeal, rendering this assignment of error moot. Courts do not routinely wade into discussions regarding questions that have been rendered moot. “Moot questions or abstract propositions, the decision of which would avail nothing in the determination of controverted rights of persons or of property, are not properly cognizable by a court.” Syl. pt. 1, *State ex rel. Lilly v. Carter*, 63 W. Va. 684, 60 S.E. 873 (1908); *accord* Syl. pt. 1, *Tynes v. Shore*, 117 W. Va. 355, 185 S.E. 845 (1936). The Court cannot grant any relief regarding this allegation given that CAMC has very clearly, and without incident, filed its appeal.

CONCLUSION

Based on the foregoing, this matter must be dismissed due to lack of standing and jurisdiction.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Steven R. Compton, Deputy Attorney General and counsel for the West Virginia Health Care Authority, do hereby certify that on the 15th day of December, 2025, I electronically filed a true copy of the foregoing *Response Brief of the West Virginia Health Care Authority* with the Court, thereby serving all parties of record via File & ServeXpress.

/s/ Steven R. Compton

Steven R. Compton
Deputy Attorney General