BRB No. 10-0131 BLA

KENNETH M. WRIGHT	)	
	)	
Claimant-Respondent	)	
	)	
v.	)	
	)	
GIBRALTAR COAL COMPANY	)	DATE ISSUED: 10/27/2010
	)	
Employer-Petitioner	)	
	)	
DIRECTOR, OFFICE OF WORKERS' COMPENSATION PROGRAMS, UNITED STATES DEPARTMENT OF LABOR	)	
	)	
Party-in-Interest	)	DECISION and ORDER

Appeal of the Decision and Order Award of Benefits of Daniel F. Solomon Administrative Law Judge, United States Department of Labor.

Brent Yonts (Brent Yonts, P.S.C.), Greenville, Kentucky, for claimant.

Laura Metcoff Klaus (Greenberg Traurig LLP), Washington, D.C., for employer.

Michelle S. Gerdano (M. Patricia Smith, Solicitor of Labor; Rae Ellen James, Associate Solicitor; Michael J. Rutledge, Counsel for Administrative Litigation and Legal Advice), Washington, D.C., for the Director, Office of Workers' Compensation Programs, United States Department of Labor.

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

PER CURIAM:

Employer appeals the Decision and Order Award of Benefits (2007-BLA-05706) of Administrative Law Judge Daniel F. Solomon (the administrative law judge) on a claim filed on May 4, 2006, pursuant to the provisions of the Black Lung Benefits Act, 30 U.S.C. §§901-944 (2006), *amended by* Pub. L. No. 111-148, §1556, 124 Stat. 119

(2010) (to be codified at 30 U.S.C. §§921(c)(4) and 932(*l*)) (the Act). The administrative law judge accepted the parties' stipulation to at least eleven years of coal mine employment. The administrative law judge further found that, while the medical evidence was insufficient to establish clinical pneumoconiosis at 20 C.F.R. §718.202(a)(1) and (4),[1] it was sufficient to establish legal pneumoconiosis[2] at 20 C.F.R. §718.202(a)(4). The administrative law judge also found that claimant's pneumoconiosis arose out of coal mine employment, *see* 20 C.F.R. §718.203(b), as that finding was subsumed in a finding of legal pneumoconiosis at Section 718.202(a)(4). In addition, the administrative law judge found that the evidence was sufficient to establish a totally disabling respiratory impairment at 20 C.F.R. §718.204(b)(2)(i) and (iv) and that the total disability was due to pneumoconiosis (disability causation) pursuant to 20 C.F.R. §718.204(c). Accordingly, benefits were awarded.

On appeal, employer contends that the administrative law judge erred in finding the medical evidence sufficient to establish legal pneumoconiosis at Section 718.202(a)(4), total respiratory disability at Section 718.204(b), and disability causation at Section 718.204(c). Claimant responds, urging affirmance of the administrative law judge's decision awarding benefits. The Director, Office of Workers' Compensation Programs (the Director), has not filed a response brief addressing employer's arguments on appeal.[3]

On March 23, 2010, amendments to the Act, affecting claims filed after January 1, 2005, that were pending on or after March 23, 2010, were enacted. In pertinent part, the amendments reinstated Section 411(c)(4) of the Act, 30 U.S.C. §921(c)(4), which provides a rebuttable presumption that a miner was totally disabled due to pneumoconiosis, that his death was due to pneumoconiosis, or that at the time of his death he was totally disabled due to pneumoconiosis, if fifteen or more years of qualifying coal mine employment and a totally disabling respiratory impairment, *see* 20 C.F.R. §718.204(b), are established.

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[1] The administrative law judge did not address whether pneumoconiosis was established at 20 C.F.R. §718.202(a)(2) and (3).

[2] "Legal pneumoconiosis" includes any chronic lung disease or impairment and its sequelae arising out of coal mine employment. This definition includes, but is not limited to, any chronic restrictive or obstructive pulmonary disease arising out of coal mine employment. 20 C.F.R. §718.201(a)(2).

[3] The administrative law judge's finding that the evidence failed to establish the existence of clinical pneumoconiosis at 20 C.F.R. §718.202(a)(1) and (4) is affirmed, as unchallenged on appeal. *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710 (1983).

By Order dated June 16, 2010, the Board provided the parties with the opportunity to address the impact, if any, of the 2010 amendments on this case. *Wright v. Gibraltar Coal Co.*, BRB No. 10-0131 BLA (June 16, 2010)(unpub. Order). The Director responds, arguing that the Board need not consider the effect of the 2010 amendments on this case, if it affirms the administrative law judge's Decision and Order awarding benefits. If, however, the Board does not affirm the administrative law judge's Decision and Order awarding benefits, the Director argues that this case must be remanded for consideration under Section 411(c)(4) and the administrative law judge must specifically consider whether fifteen years of qualifying coal mine employment were established. *See* 30 U.S.C. §921(c)(4); *Director, OWCP v. Midland Coal Co.* [*Leachman*], 855 F.2d 509, 512 (7th Cir. 1988). Further, the Director contends that, if the case is remanded for consideration under Section 411(c)(4), the administrative law judge should allow the parties the opportunity to proffer additional evidence consistent with the evidentiary limitations set forth in 20 C.F.R. §725.414, or upon a showing of good cause under 20 C.F.R. §725.456. Employer responds, arguing that Section 411(c)(4) is not applicable as the evidence in this case does not establish fifteen years of qualifying coal mine employment. *See* 30 U.S.C. §921(c)(4). Claimant responds, arguing that Section 411(c)(4) is applicable based on his length of coal mine employment and the evidence of record, which supports a finding of total disability at Section 718.204(b).

The Board's scope of review is defined by statute. The administrative law judge's Decision and Order must be affirmed if it is supported by substantial evidence, rational, and in accordance with applicable law.[4] 33 U.S.C. §921(b)(3), as incorporated into the Act by 30 U.S.C. §932(a); *O'Keeffe v. Smith, Hinchman & Grylls Associates, Inc.*, 380 U.S. 359 (1965).

In order to establish entitlement to benefits pursuant to 20 C.F.R. Part 718, claimant must establish that he suffers from pneumoconiosis, that the pneumoconiosis arose out of coal mine employment, and that the pneumoconiosis is totally disabling. *See* 20 C.F.R. §§718.3, 718.202, 718.203, 718.204. Failure to establish any one of these elements precludes entitlement. *Peabody Coal Co. v. Hill*, 123 F.3d 412, 21 BLR 2-192 (6th Cir. 1997); *Trent v. Director, OWCP*, 11 BLR 1-26 (1987); *Gee v. W.G. Moore and Sons*, 9 BLR 1-4 (1986) (*en banc*); *Perry v. Director, OWCP*, 9 BLR 1-1 (1986) (*en banc*).

After consideration of the arguments on appeal, the administrative law judge's Decision and Order and the evidence of record, we conclude that the administrative law

[4] Because claimant was last employed in the coal mining industry in Kenucky, we will apply the law of the United States Court of Appeals for the Sixth Circuit. *See Shupe v. Director, OWCP*, 12 BLR 1-200 (1989) (*en banc*); Director's Exhibit 3.

judge's Decision and Order awarding benefits is rational, supported by substantial evidence, and consistent with applicable law.

Legal Pneumoconiosis – 20 C.F.R. §718.202(a)(4)

In finding legal pneumoconiosis established at Section 718.202(a)(4), the administrative law judge credited the opinions of Drs. Rasmussen, Simpao and Baker, who opined that both coal dust exposure and obesity[5] contributed to claimant's chronic obstructive pulmonary disease (COPD), over the contrary opinions of Drs. Repsher and Fino. The administrative law judge credited the former opinions because he found, "[t]hey base their opinions on the well documented evidence which includes [c]laimant's occupational, medical and smoking history, pulmonary function and arterial blood gas studies, and symptomatology." Decision and Order at 24. In particular, the administrative law judge noted that Dr. Rasmussen best described the physicians' reasoning, by explaining:

> Mine dust and obesity both appear to be at least capable of causing [claimant's] impairment, and likely share in its cause. It appears on the basis of the evidence we have in this case, and the unfortunate absence of adequate exercise gas exchange impairment, we are left with no clear way to separate the effects of these two conditions.

Claimant's Exhibit 3; Decision and Order at 24.

Turning to the opinion of Dr. Repsher, the administrative law judge noted that Dr. Repsher observed that claimant did not have a respiratory impairment and that claimant's "loss of lung function" and the "obstructive and restrictive defects," reflected on his pulmonary function studies, were, in fact, due to his obesity. The administrative law judge, however, found that Dr. Repsher's opinion was entitled to little weight as its reasoning was flawed and it was outweighed by contrary opinions. Specifically, the administrative law judge noted that Dr. Repsher's opinion was not well-reasoned because he did not explain how claimant's qualifying pulmonary function studies were, in fact, normal, when the test results were adjusted for obesity. The administrative law judge, therefore, rejected Dr. Repsher's opinion that claimant did not have legal pneumoconiosis.

[5] The administrative law judge noted that claimant testified at the hearing that he was six feet, two inches tall and weighed three hundred and twenty pounds. Decision and Order at 4; Hearing Transcript at 21.

Regarding Dr. Fino's opinion, that claimant's COPD was not due to coal dust exposure, the administrative law judge accorded it less weight because he found that Dr. Fino focused solely on whether claimant's coal dust exposure was the cause of his COPD, without considering whether it could have been "a contributing or aggravating factor of whatever disease…caus[ed] [c]laimant's obstruction." Decision and Order at 23. Further, the administrative law judge accorded less weight to Dr. Fino's opinion, that claimant's COPD was due to a factor other than coal dust exposure, because Dr. Fino did not explain the basis for his finding that a coal dust disease would not progress as quickly as claimant's COPD had. Decision and Order at 23. The administrative law judge, therefore, accorded little weight to Dr. Fino's opinion.

Contrary to employer's first contention, the administrative law judge properly accorded greater weight to Dr. Rasmussen's opinion, based on Dr. Rasmussen's qualifications. The administrative law judge acknowledged that, based solely on credentials,[6] Drs. Baker, Repsher, Fino and Rasmussen were all "well qualified to give an opinion on both clinical and legal pneumoconiosis[,]" but nonetheless properly found that Dr. Rasmussen was "slightly more qualified to offer an opinion on legal pneumoconiosis[,]" in light of his "research and more recent published work on COPD and pneumoconiosis." Decision and Order at 22; *see Martin v. Ligon Preparation Co.*, 400 F.3d 302, 23 BLR 2-261 (6th Cir. 2005); *Dillon v. Peabody Coal Co.*, 11 BLR 1-113 (1988). *Anderson v. Valley Camp of Utah, Inc.*, 12 BLR 1-111 (1989).

Further, contrary to employer's contention, the fact that the administrative law judge rejected Dr. Baker's finding of clinical pneumoconiosis does not mean that the administrative law judge was required to reject his opinion concerning the existence of legal pneumoconiosis. *See Martin*, 400 F.3d at 306, 23 BLR at 2-285. Legal pneumoconiosis, as defined in 20 C.F.R. §718.201, is a broader category which is not dependent upon a determination of clinical pneumoconiosis and, contrary to employer's contention, the absence of clinical pneumoconiosis does not necessarily influence a physician's diagnosis of legal pneumoconiosis. *Jones v. Badger Coal Co.*, 21 BLR 1-102 (1998) (*en banc*).

Regarding Dr. Repsher's opinion, that claimant did not have a respiratory impairment, the administrative law judge properly rejected it. Contrary to employer's

[6] The administrative law judge recognized that Drs. Baker, Repsher and Fino were all Board-certified pulmonologists, and that, while Dr. Rasmussen was not a Board certified pulmonologist, he was "an acknowledged expert in the field of pulmonary impairments of coal miners," citing 1972 U.S. Code Cong. Adm. News 2305, 2314 and *Martin v. Ligon Preparation Co.*, 400 F.3d 302, 23 BLR 2-261 (6th Cir. 2005). Decision and Order at 21-22.

argument, the administrative law judge properly found the opinion unreasoned because Dr. Repsher did not adequately explain how he determined that claimant's qualifying pulmonary function study results were, in fact, normal, when adjusted for claimant's obesity. *See Clark v. Karst-Robbins Coal Co.*, 12 BLR 1-149 (1989)(*en banc*); *Fields v. Island Creek Coal Co.*, 10 BLR 1-19 (1987). Further, contrary to employer's contention, the administrative law judge permissibly considered the fact that Dr. Repsher was the only physician to find that claimant did not have a COPD. *See Snorton v. Zeigler Coal Co.*, 9 BLR 1-106, 1-107 (1986).

Additionally, contrary to employer's contention, the administrative law judge did not impermissibly shift the burden of proof to employer, when he accorded little weight to Dr. Fino's opinion because the doctor did not consider whether coal dust exposure could have contributed to or aggravated claimant's COPD. Rather, the administrative law judge accorded little weight to Dr. Fino's opinion, as to the cause of COPD, because the doctor failed to explain the basis of his opinion that claimant's COPD was caused by his obesity or to explain his reasoning or provide any support for his finding that claimant's rapid loss of lung function was inconsistent with a disease process due to coal dust exposure. *See* 20 C.F.R. §718.201; *Roberts v. Schaefer Co. v. Director, OWCP* [*Williams*], 400 F.3d 992, 23 BLR 2-302 (7th Cir. 2005); *Midland Coal Co. v. Director, OWCP* [*Shores*], 358 F.3d 486, 23 BLR 2-18 (7th Cir. 2004).

In conclusion, the administrative law judge properly evaluated the medical opinion evidence and found legal pneumoconiosis established at Section 718.202(a)(4). Accordingly, we affirm the administrative law judge's finding that legal pneumoconiosis was established at Section 718.202(a)(4).

Total Respiratory Disability – 20 C.F.R. §718.204(b)

In finding that a totally disabling respiratory impairment was established at Section 718.204(b)(2)(i) and (iv), the administrative law judge found that all three of the pulmonary function studies of record were valid and produced qualifying results and that the well-reasoned opinion of Dr. Simpao, which was supported by the opinions of Drs. Baker and Rasmussen, established a totally disabling respiratory impairment. Specifically, the administrative law judge found Dr. Simpao's opinion, that claimant had a totally disabling respiratory impairment, to be well-documented and well-reasoned because, it was based, in part, on a qualifying pulmonary function study and supported by claimant's "subjective complaints and reported symptoms." Decision and Order at 16. Additionally, the administrative law judge found that Dr. Simpao "formed his opinion after considering the physical demands of [c]laimant's last position of coal mine

employment as a tipple operator."[7] Decision and Order at 16; Director's Exhibit 12 at 25. While the administrative law judge accorded less weight to the opinions of Drs. Baker and Rasmussen, because they did not consider the physical demands of claimant's last coal mine employment, he nonetheless found them supportive of Dr. Simpao's opinion because they were otherwise well-reasoned and well-documented; *i.e.*, they were based, in part, on valid qualifying pulmonary function studies showing total respiratory disability. Decision and Order at 16.

The administrative law judge accorded less weight to the opinions of Drs. Repsher and Fino because he found that they were not well-reasoned. Specifically, the administrative law judge accorded less weight to Dr. Repsher's opinion because the doctor did not sufficiently explain how claimant's obesity caused his total disability and did not explain how he found claimant's otherwise qualifying pulmonary function studies to be normal, when adjusted for claimant's obesity. Similarly, the administrative law judge accorded less weight to Dr. Fino's opinion that claimant did not have a totally disabling respiratory impairment because it was not well-reasoned. The administrative law judge noted that Dr. Fino's opinion was internally inconsistent because he found, on the one hand, that claimant had only disabling obesity, then found that obesity did not solely account for his disability. Additionally, the administrative law judge accorded less weight to Dr. Fino's opinion because the doctor stated that he could not determine whether claimant was totally disabled from performing the work of a tipple operator, his usual coal mine employment.

Employer first contends that the administrative law judge erred in finding total respiratory disability established at Section 718.204(b)(2)(i) and (iv) because he failed to weigh all the relevant evidence together. In finding total respiratory disability established, the administrative law judge considered the evidence relevant to each subsection of Section 718.204(b), finding that none of the blood gas studies were qualifying at subsection (ii), but that all of the pulmonary function studies were qualifying at subsection (i), and that the medical opinion evidence established total disability at subsection (iv). The administrative law judge did not specifically discuss together the evidence relevant to each subsection of Section 718.204(b)(2). However, because he acknowledged that the blood gas study evidence was non-qualifying, while the pulmonary function study and medical opinion evidence was qualifying, and he considered the medical opinions, which addressed the results of both pulmonary function

[7] The administrative law judge noted that Dr. Simpao understood that this position "requir[ed] frequent bending and stooping while shoveling twenty pounds of coal." Decision and Order at 14; Director's Exhibit 12.

studies and blood gas studies,[8] we conclude that the administrative law judge's decision is sufficient to show that the administrative law judge considered all of the relevant evidence together in finding total respiratory disability established. *See Piney Mountain Coal Co. v. Mays*, 176 F.3d 753, 21 BLR 2-587 (4th Cir. 1999); *Shedlock v. Bethlehem Mines Corp.*, 9 BLR 1-195 (1986). Employer's argument is, therefore, rejected.

Employer next contends that the administrative law judge erred in crediting the opinion of Dr. Simpao because Dr. Simpao understood the demands of claimant's last coal mine employment as a tipple operator, when, in fact, the doctor did not determine whether claimant was precluded from performing that work from a respiratory standpoint, or from his knee problems and deconditioning. Employer also contends that the administrative law judge did not consider whether Dr. Simpao's opinion was sufficiently definitive regarding the effect that claimant's obesity had on his disability.

Contrary to employer's argument, Dr. Simpao specifically found that claimant was totally disabled from his usual coal mine employment due to a moderate degree of both restrictive and obstructive *airways* disease. Director's Exhibit 12. Thus, the administrative law judge properly found that claimant was *totally disabled due to a respiratory impairment*. *See Street Jewell Smokeless Coal Corp. v. Street*, 42 F.3d 241, 19 BLR 2-1 (4th Cir. 1994).

Employer also asserts that the administrative law judge erred in both crediting and discrediting the opinions of Drs. Rasmussen and Baker. Contrary to employer's argument, while acknowledging that the opinions of Drs. Baker and Rasmussen were entitled to less weight than Dr. Simpao's opinion because they did not address the physical demands of claimant's usual coal mine employment, he nonetheless permissibly found that their opinions were entitled to "some weight" because they were "otherwise well documented and supportive of Dr. Simpao's well-reasoned opinion."[9] Decision and Order at 16; *see Clark*, 12 BLR at 1-155.

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[8] Although the administrative law judge noted that the three blood gas studies of record were non-qualifying at 20 C.F.R. §718.204(b)(2)(ii), Decision and Order at 5, he observed that Drs. Simpao, Repsher and Baker each addressed the results of the blood gas study conducted as part of his examination of claimant. Dr. Simpao found that claimant's blood gas study indicated a "ventilatory perfusion mismatch." Decision and Order at 6; Director's Exhibit 12. Dr. Repsher indicated that claimant's blood gas study "revealed mild hypoxemia," Decision and Order at 7; Employer's Exhibit 1. Dr. Baker found that claimant's blood gas study revealed a "mild resting hypoxemia." Decision and Order at 9; Claimant's Exhibit 1.

[9] Dr. Baker conducted a physical examination, pulmonary function study and blood gas study, and took claimant's medical and occupational histories. Based on the

Further, contrary to employer's argument, the administrative law judge properly accorded less weight to the opinions of Drs. Fino and Repsher, as he found them not well-reasoned. Decision and Order at 16. Specifically, the administrative law judge noted that Dr. Repsher's opinion was unreasoned because, while he maintained that claimant's pulmonary function study results were normal when adjusted for claimant's obesity, the doctor failed to provide a reasoned explanation as to how he adjusted the pulmonary function study results for claimant's obesity, "other than to state that he did so based on his experience." Decision and Order at 16. Moreover, in evaluating Dr. Repsher's opinion, the administrative law judge noted that Dr. Repsher "acknowledged that his adjustments were very subjective and not based on any particular formula or study." *Id*; Employer's Exhibit 4 at 31. The administrative law judge also properly accorded less weight to Dr. Repsher's opinion because the doctor opined that claimant's obstructive defect was caused by obesity, which was contrary to the opinion of the other physicians. Decision and Order at 17; *see Clark*, 12 BLR at 1-155; *Snorton*, 9 BLR at 1-107.

Finally, employer asserts that the administrative law judge erred in according little weight to Dr. Fino's opinion because Dr. Fino did not consider the physical demands of claimant's last coal mine employment, when the administrative law judge accepted the opinions of Drs. Rasmussen and Baker, who also failed to consider the physical demands of claimant's last coal mine employment. The administrative law judge, however, permissibly accorded little weight to Dr. Fino's opinion because he found that it was internally inconsistent, as the doctor first stated that both claimant's restrictive and obstructive impairments were due to obesity, but later stated that claimant's chronic obstructive pulmonary disease was not due to obesity. *See Clark*, 12 BLR at 155; Decision and Order at 17; Employer's Exhibits 2, 3 at 21. Additionally, the administrative law judge correctly found that Dr. Fino's opinion was not credible as the doctor considered the demands of claimant's earlier coal mine employment as a dozer operator, which consisted of mainly "sitting and operating levers." Decision and Order at 11; Employer's Exhibit 3, and not the physical demands of his usual coal mine employment as a tipple operator. Decision and Order at 11. Claimant testified that his work as a tipple operator required climbing 300-350 feet up in the air and doing all types of labor. Hearing Transcript at 36, 38. *See Stark v. Director, OWCP*, 9 BLR 1-36, 1-37

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results of his findings on examination and testing, Dr. Baker concluded that claimant did not have the respiratory capacity to return to work as a coal miner. Decision and Order at 8-9; Claimant's Exhibit 1. Dr. Rasmussen, based on his review of the medical reports of Drs. Simpao, Fino and Baker, and Dr. Baker's deposition transcript, determined that claimant had a totally disabling lung disease. Decision and Order at 12-13; Claimant's Exhibit 3.

(1986). Further, the administrative law judge found that only the opinions of Drs. Baker and Rasmussen "supported" Dr. Simpao's opinion finding total respiratory disability, not that they independently established total disability. *See Anderson*, 12 BLR at 113.

In conclusion, therefore, based on his evaluation of the evidence, we affirm the administrative law judge's finding that total respiratory disability was established, based on the pulmonary function study and medical opinion evidence at Section 718.204(b)(2)(i) and (iv), and on the evidence as a whole at Section 718.204(b).

Disability Causation – 20 C.F.R. §718.204(c)

In finding disability causation established at Section 718.204(c), the administrative law judge credited the opinion of Dr. Rasmussen, which he found supported by the opinions of Drs. Simpao and Baker. The administrative law judge stated that he accepted "Dr. Rasmussen's well reasoned opinion that coal dust is one of two causes of [c]laimant's totally disabling respiratory condition and [found] it sufficient to establish that pneumoconiosis is a substantially contributing cause of claimant's total respiratory disability." Decision and Order at 25. The administrative law judge accorded less weight to the opinions of Drs. Repsher and Fino that "dismiss[ed]" [c]laimant's coal dust exposure as a possible factor of his disability because they do not find he has suffered from legal pneumoconiosis." Decision and Order at 25.

Contrary to employer's arguments, the administrative law judge properly found that disability causation was established at Section 718.204(c), based on the opinions of Drs. Rasmussen, Simpao and Baker that claimant's legal pneumoconiosis was a substantially contributing cause of claimant's total disability, because he found them to be better reasoned than the contrary opinions. *See* discussion, *infra*; *see Gross v. Dominion Coal Corp.*, 23 BLR 1-8 (2003); *Clark*, 12 BLR at 1-155. The administrative law judge properly accorded less weight to the opinions of Drs. Fino and Repsher, because neither physician found legal pneumoconiosis. *See Toler v. Eastern Assoc. Coal Corp.*, 43 F.3d 109, 19 BLR 2-70 (4th Cir. 1995); Decision and Order at 25-26. Accordingly, we affirm the administrative law judge's finding that disability causation was established at Section 718.204(c).

In conclusion, we affirm the administrative law judge's findings that the evidence was sufficient to establish legal pneumoconiosis at Section 718.202(a)(4), total respiratory disability at Section 718.204(b), and disability causation at Section 718.204(c). We, therefore, affirm the administrative law judge's decision awarding benefits. Because we affirm the administrative law judge's decision awarding benefits, we need not remand the case for consideration under 30 U.S.C. §921(c)(4). *See Coen v. Director, OWCP*, 7 BLR 1-30 (1984).

Accordingly, the administrative law judge's Decision and Order Award of Benefits is affirmed.

SO ORDERED.

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NANCY S. DOLDER, Chief
Administrative Appeals Judge

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ROY P. SMITH
Administrative Appeals Judge

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BETTY JEAN HALL
Administrative Appeals Judge