BRB No. 05-0963 BLA

BURLEY COMBS	)	
	)	
Claimant-Respondent	)	
	)	
v.	)	
	)	
GOLDEN OAK MINING COMPANY	)	DATE ISSUED: 07/27/2006
	)	
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 J. Roketenetz, Administrative Law Judge, United States Department of Labor.

James D. Holliday, Hazard, Kentucky, for claimant.

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

Rita Roppolo (Howard M. Radzely, Solicitor of Labor; Allen H. Feldman, Associate Solicitor; Rae Ellen Frank James, Deputy 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: SMITH, McGRANERY, and HALL, Administrative Appeals Judges.

PER CURIAM:

Employer appeals the Decision and Order-Award of Benefits (04-BLA-5672) of Administrative Law Judge Daniel J. Roketenetz (the administrative law judge) rendered on a subsequent claim filed pursuant to the provisions of Title IV of the Federal Coal Mine Health

and Safety Act of 1969, as amended, 30 U.S.C. §901 *et seq*. (the Act).[1] The administrative law judge found that this claim, filed September 25, 2002, constitutes a subsequent claim pursuant to 20 C.F.R. §725.309, that claimant had a smoking history of sixty-three pack years, and a coal mine employment history of thirty-five years. The administrative law judge found that the weight of the newly submitted x-ray evidence established the existence of pneumoconiosis pursuant to 20 C.F.R. §718.202(a)(1), and that claimant, therefore, established a change in an applicable condition of entitlement subsequent to the denial of the prior claim.[2] Decision and Order at 8. The administrative law judge further determined that claimant established a totally disabling respiratory impairment pursuant to 20 C.F.R. §718.204(b)(2), and that the totally disabling respiratory impairment was due to pneumoconiosis pursuant to 20 C.F.R. §718.204(c). Accordingly, benefits were awarded.

On appeal, employer contends that the administrative law judge erred: in the standard he applied to determine whether a change in an applicable condition of entitlement had been established at Section 725.309; in finding that the evidence establishes the existence of pneumoconiosis; in his determination that claimant established the presence of a totally disabling respiratory impairment; and in finding that claimant's totally disabling respiratory impairment was due to pneumoconiosis (disability causation). Claimant responds, urging that the administrative law judge's award of benefits be affirmed. The Director, Office of Workers' Compensation Programs, (the Director) while taking no position on the ultimate issue of entitlement, challenges employer's assertion that the administrative law judge erred in his analysis at Section 725.309.[3]

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[1] Claimant filed his first claim for benefits on March 17, 1994. That claim was denied by the Department of Labor on August 31, 1994 and again on February 15, 1996. Director's Exhibit 1. Subsequent to a hearing, Administrative Law Judge Robert L. Hillyard issued a Decision and Order denying benefits. Judge Hillyard found that claimant failed to establish the existence of pneumoconiosis pursuant to 20 C.F.R. §718.202(a) or the presence of a totally disabling impairment pursuant under what was then Section 20 C.F.R. §718.204(c), now Section 718.204(b). Director's Exhibit 1. Pursuant to claimant's appeal, the Board affirmed the denial of benefits because the evidence failed to establish the presence of a totally disabling respiratory impairment. *Combs v. Golden Oak Mining Co.*, BRB No. 97-1368 BLA (May 20, 1998)(unpub.).

[2] Although the administrative law judge refers to a "material change in conditions," *see* Decision and Order at 5. This subsequent claim which was filed September 25, 2002, is governed by the amended regulation at 20 C.F.R. §725.309 (2002), under which claimant must now show a change in an applicable condition since the prior denial of benefits. *See* 20 C.F.R. §725.309 (2002).

[3] The administrative law judge's length of coal mine employment determination as

The Board's scope of review is defined by statute. If the administrative law judge's findings of fact and conclusions of law are supported by substantial evidence, are rational, and are consistent with applicable law, they are binding upon this Board and may not be disturbed. 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).

Employer first argues that the administrative law judge erred in finding that claimant established a change in an applicable condition of entitlement at Section 725.309. Specifically, employer contends that the administrative law judge could not find a change in an element previously adjudicated against claimant since the prior denial of benefits by the Board was based on claimant's failure to establish a totally disabling respiratory impairment, not the existence of pneumoconiosis. *See Combs v. Golden Oak Mining Co.*, BRB No. 97-1368 BLA (May 20, 1998)(unpub.). Employer contends that the administrative law judge failed to conduct the proper inquiry and failed to provide an analysis of the qualitative differences in proof between the prior evidence and the newly submitted evidence as required by the United States Court of Appeals for the Sixth Circuit, within whose jurisdiction this claim arises. *See Tennessee Consolidation Coal Co. v. Kirk*, 264 F.3d 602, 22 BLR 2-288 (6th Cir. 2001); *Grundy Mining Co. v. Flynn*, 353 F.3d 467, 23 BLR 2-44 (6th Cir. 2003); *Sharondale Corp. v. Ross*, 42 F.3d 993, 19 BLR 2-10 (6th Cir. 1994). Moreover, employer contends that claimant received a full and fair adjudication of his first claim, that he never filed for modification and has submitted no proof that he accrued a new cause of action subsequent to the previous denial because claimant never went back to coal mining and no doctor found any change in claimant's respiratory condition. Thus, employer contends that since the amended regulation was "designed to eliminate the Sixth Circuit's requirement that an actual qualitative change [since the previous denial] must be established," it is invalid because the revision to the regulation impermissibly presumes a change in condition without requiring a finding of such.

In finding that claimant established a change in an applicable condition of entitlement pursuant to Section 725.309, the administrative law judge properly found that the initial claim in this case was denied when it was determined that claimant failed to establish the existence of pneumoconiosis, the presence of a totally disabling respiratory impairment, and disability causation. Decision and Order at 6. Considering evidence relevant to the existence of pneumoconiosis, one of the elements previously adjudicated against claimant, the

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well as his determination that claimant did not demonstrate the existence of a totally disabling respiratory impairment pursuant to 20 C.F.R. §718.204(b)(2)(i)-(iii) are unchallenged on appeal. Accordingly, these findings are affirmed. *See Skrack v. Island Creek Coal Co.*, 6 BLR 1-710 (1983).

administrative law judge found that the newly submitted evidence consisted of x-rays dated November 16, 2002 and April 24, 2003. The administrative law judge found that the November 16, 2002 x-ray which was read as positive by Dr. Baker, a B-reader,[4] Director's Exhibit 14, was reread as negative by Dr. Halbert, a dually qualified B-reader and board-certified radiologist, Director's Exhibit 25, and as positive by Dr. Alexander, also a dually qualified physician, Claimant's Exhibit 2. Thus, as the x-ray was read as both positive and negative by equally qualified readers, the administrative law judge concluded that the readings of the November 16, 2002 x-ray were in equipoise and that that x-ray could not establish the existence of pneumoconiosis. Decision and Order at 7.

Turning to the x-ray of April 24, 2003, which was read as negative by Dr. Fino, a B-reader, Director's Exhibit 24, but as positive by Dr. Alexander, a dually-qualified reader, Claimant's Exhibit 2, the administrative law judge accorded greater weight to the interpretation of Dr. Alexander based on the physician's superior credentials. Decision and Order at 7. Thus, the administrative law judge permissibly concluded that the preponderance of the newly submitted x-ray evidence by the physicians with superior qualifications was positive for the existence of pneumoconiosis and established the existence of the disease and a change in an applicable condition of entitlement. Decision and Order at 8; *see Staton v. Norfolk & Western Ry. Co.*, 65 F.3d 55, 19 BLR 2-271 (6th Cir. 1997); *Woodward v. Director, OWCP*, 991 F.2d 314, 17 BLR 2-77 (6th Cir. 1993).

Contrary to employer's assertion, the basis for the previous denial of benefits was not only the failure of claimant to establish a totally disabling respiratory impairment, but also the failure to establish the existence of pneumoconiosis. *See* Decision and Order of Administrative Law Judge Hillyard, dated June 19, 1997; Director's Exhibit 1. Because the Board affirmed Judge Hillyard's finding of no total disability, an essential element of entitlement, it affirmed the denial of benefits and did not reach the finding of pneumoconiosis. *Combs*, BRB No. 97-1368 BLA, *slip op.* at 2-3. Accordingly, the administrative law judge's finding that claimant now suffers from the disease based on newly submitted x-ray evidence, is sufficient to establish a change in an applicable condition of entitlement. *See Ross*, 42 F.3d 993, 19 BLR 2-10.

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[4] A B-reader is a physician who has demonstrated proficiency in classifying x-rays according to the ILO-U/C standards by successful completion of an examination established by the National Institute for Occupational Safety and Health. *See* 20 C.F.R. §718.202(a)(1)(ii)(E); 42 C.F.R. §37.51; *Mullins Coal Company, Inc. of Virginia v. Director, OWCP*, 484 U.S. 135, 145 n.16, 11 BLR 2-1, 2-6 n.16 (1987), *reh'g denied*, 484 U.S. 1047 (1988); *Roberts v. Bethlehem Mines Corp.*, 8 BLR 1-211 (1985). A board-certified radiologist is a physician who has been certified by the American Board of Radiology as having a particular expertise in the field of radiology.

Further, employer's assertion that the administrative law judge's analysis under Section 725.309(d) must include a determination of whether the evidence developed in the current claim differs qualitatively from the evidence developed in the prior claim based on Sixth Circuit precedent is rejected. Employer is construing the prior version of Section 725.309, while the current claim was filed after the effective date of the amendments to the regulations, including Section 725.309(d). Under the revised version of Section 725.309, claimant no longer has the burden of proving a "material change in condition;" rather, claimant must show that one of the applicable conditions of entitlement has changed since the prior denial by submitting new evidence developed in connection with the current claim that establishes an element of entitlement upon which the prior denial was based. 20 C.F.R. §725.309(d)(2), (3).

Employer next argues that the administrative law judge erred in finding that the weight of all of the evidence of record supports a finding of the existence of pneumoconiosis pursuant to Section 718.202(a)(1). Specifically, employer contends that there were far more negative x-ray interpretations than positive in the initial claim and that the only reason the numbers are more evenly balance in the second claim is because of the evidentiary limitations found at 20 C.F.R. §725.414. Employer contends that the administrative law judge irrationally ignored relevant x-ray evidence when he failed to credit negative interpretations that were not on an ILO form. Lastly, employer argues that administrative law judge erred in summarily discrediting the x-ray interpretations from the prior claim. Employer argues that inasmuch as this is a subsequent claim, the administrative law judge erred "simply and mechanically" discarding the evaluation of the x-ray evidence in the prior claim without reason and that such action impermissibly constitutes a "bare appeal to recency." Employer's Brief at 21.

In finding that the overall weight of the x-ray evidence established the existence of pneumoconiosis pursuant to Section 718.202(a)(1), the administrative law judge found that because the previously submitted x-ray evidence was dated prior to March, 1995, the newly submitted evidence which was far more recent, dated 2002 and 2003, was more credible on the issue of the existence of pneumoconiosis. This was permissible. *See Adkins v. Director, OWCP*, 958 F.2d 49, 16 BLR 2-61 (4th Cir. 1992). The administrative law judge also permissibly relied upon the preponderance of the newer positive readings by physicians with superior qualifications. *Staton*, 65 F.3d 55, 19 BLR 2-271; *Woodward*, 991 F.2d 314, 17 BLR 2-77. Likewise, employer's assertion that the administrative law judge erred in according little weight to x-rays not properly classified under the ILO/U-C standards, is rejected. *See* 20 C.F.R. §718.102(a), (b); *Wilt v. Wolverine Mining Co.*, 14 BLR 1-70; *Sheckler v. Clinchfield Coal Co.*, 7 BLR 1-128 (1984). Accordingly, the administrative law judge's finding that the existence of pneumoconiosis was established by x-ray evidence pursuant to 20 C.F.R. §718.202(a)(1) is affirmed. *Director, OWCP v. Greenwich Collieries* [*Ondecko*], 512 U.S. 267, 18 BLR 2A-1 (1994), *aff'g Greenwich Collieries v. Director,*

OWCP, 990 F.2d 730, 17 BLR 2-64 (3d Cir. 1993).

Employer next argues that the administrative law judge erred in finding that claimant established the presence of a totally disabling respiratory impairment pursuant to Section 718.204(b)(2)(iv). Employer argues that the medical opinions of Drs. Baker, Westerfield and Fino, Director's Exhibits 14, 24, 26; Claimant's Exhibit 5; Employer's Exhibits 1, 3, which the administrative law judge relied upon as support for a finding of a totally disabling respiratory impairment, failed to show that the doctors had any familiarity with the requirements of claimant's last usual coal mine employment and that the administrative law judge failed to resolve the conflict in claimant's testimony regarding the physical demands of his coal mine employment. Accordingly, employer contends that the administrative law judge erred in finding total respiratory disability established. Employer further asserts that the administrative law judge erred in dismissing various treatment notes, Director's Exhibit 21; Claimant's Exhibit 1; on the ground that such notes did not contain disability determinations. Employer avers that a medical opinion which addresses claimant's health over many years and does not address total respiratory disability is affirmative evidence of the absence of such disability. Additionally, employer argues that in considering the evidence of a totally disabling respiratory impairment, the administrative law judge failed to weigh all of the evidence, like and unlike together, prior to finding claimant totally disabled.

In considering the evidence relevant to total respiratory disability, the administrative law judge found that while claimant's primary coal mine employment involved working on beltlines and head drives, the work also involved cutting coal, running loaders, operating shuttle cars, bolting roofs, and general labor. The administrative law judge further noted that claimant testified that his job involved heavy lifting of up to one-hundred pounds. The administrative law judge observed that claimant last worked both underground and at the surface level head driving. Decision and Order at 3.

In light of claimant's testimony, the administrative law judge concluded that the opinion of Dr. Baker, that claimant had a moderate impairment and could not perform his previous coal mine employment duties as a loader, cutter and general repairman, the opinion of Dr. Fino, that claimant was totally disabled and could not perform his previous coal mine employment, as well as the opinion of Dr. Westerfield that claimant had a totally disabling pulmonary impairment were sufficient, along with the qualifying pulmonary function study to establish total disability. The administrative law judge accorded "little weight" to hospital and treatment records in the record because he found they contained no disability determinations.

At the outset, we reject employer's assertion that the administrative law judge erred in ignoring the various treatment notes in the record on the ground that they did not discuss the issue of disability. Contrary to employer's argument, the administrative law judge did not "ignore" these notes, *see* Decision and Order at 11; rather he found them entitled to "little

weight" on the ground that they were "devoid of any disability determinations," Decision and Order at 11, and there were other opinions by doctors who specifically addressed whether claimant was disabled, along with relevant pulmonary function studies and blood gas studies. This was proper. *See generally Aleshire v. Central Coal Co.*, 8 BLR 1-70 (1985).

Review of the record also shows that the administrative law judge acted properly in finding that claimant's last coal mine employment involved "heavy labor." Claimant testified at the hearing that he had "done just about everything that could be done in the mines, including working on the belt line, head drives, cutters, loaders, shuttle car and bolter." Hearing Transcript at 13. He testified that he mostly worked at the belt line and head drive which involved heavy lifting (carrying bags of rock dust weighing around 70 pounds "a pretty good distance," and carrying heavier things such as timbers (jackposts) weighing over 100 pounds. Hearing Transcript 13. Claimant testified that his coal mine employment included time underground and aboveground, including work as a security guard and a general laborer, but that his last work was on the "head drives" which was part of the belt line and involved a lot of shoveling. Hearing Transcript at 14.

In describing claimant's coal mine employment, Dr. Baker stated that claimant operated a cutting machine, loader, cutter, and belt. Dr. Baker also noted that claimant worked as a repairman, guard, and did general inside labor and that he was disabled from returning to his coal mine employment. Claimant's Exhibit 5. Dr. Fino found that claimant worked in underground coal mine employment for thirty years until 1993, except for a couple of years, and that his last job was as a beltman which he was having trouble doing due to breathing problems. Dr. Fino concluded that claimant was disabled from doing his last coal mining job or any job requiring similar effort. Director's Exhibit 24. In addition, Dr. Westerfield found that claimant had a totally disabling respiratory impairment. Employer's Exhibit 3. Although Dr. Westerfield did not address claimant's usual coal mine employment in his most recent report, he reviewed the reports of Drs. Baker and Fino, who discussed the duties of claimant's usual coal mine employment, Employer's Exhibit 3. Further, in an earlier report, Dr. Westerfield stated that claimant had thirty years of coal mine employment including various jobs in underground coal mine employment and that from 1985 to 1993 he watched the head drive.

Hence, based on a review of the doctors' opinions, claimant's testimony, and the administrative law judge's Decision and Order, we conclude that the administrative law judge acted properly in finding that the medical opinions established that claimant could no longer perform the duties of his last usual coal mine employment. Contrary to employer's argument, the administrative law judge properly found that the doctors did address the exertional requirements of claimant's usual coal mine employment. Likewise, contrary to employer's argument, the administrative law judge's decision shows that he did consider all of the relevant evidence, *i.e.*, pulmonary function studies and blood gas studies. Decision and Order at 9-12; *see Cross Mountain Coal, Inc. v. Ward*, 93 F.3d 211, 218-19, 20 BLR 2-

360 (6th Cir. 1996); *Hvizdzak v. North American Coal Corp.*, 7 BLR 1-469 (1984); *Fields v. Island Creek Coal Co.*, 10 BLR 1-19 (1987); *Rafferty v. Jones & Laughlin Steel Corp.*, 9 BLR 1-231 (1987); *Shedlock v. Bethlehem Mines Corp.*, 9 BLR 1-195 (1986), *aff'd on recon.*, 9 BLR 1-236 (1987).

Contrary to employer's argument, the decision of the Sixth Circuit in *Cornett v. Benham Coal, Inc.*, 227 F.3d 569, 22 BLR 2-107 (6th Cir. 2000) is not dispositive in this case, as the court, in that case, held that a finding of mild impairment could, when compared to the exertional requirements of claimant's usual coal mine employment, establish total disability and further held that opinions which found that claimant was not totally disabled without considering the specific exertional requirements of claimant's usual coal mine employment were not reliable. In this case, the doctors relied upon by the administrative law judge to find total disability described claimant's jobs, claimant testified as to the exertional requirements of his jobs and the administrative law judge found, in light of the claimant's testimony and the doctors' opinions, that claimant was totally disabled. This was proper. Accordingly, we affirm the administrative law judge's finding that the evidence establishes total disability pursuant to Section 718.204(b)(2)(iv).

Finally, employer argues that the administrative law judge erred in finding that claimant's totally disabling respiratory impairment was due to pneumoconiosis pursuant to Section 718.204(c). Employer asserts that the administrative law judge erred in not crediting the opinion of Dr. Westerfield who ruled out coal mine employment as a cause of claimant's total respiratory disability and the opinion of Dr. Fino who found that claimant did not have pneumoconiosis, but also stated that, even assuming that claimant had pneumoconiosis, it was not a cause of claimant's total respiratory disability. Moreover, employer argues that the administrative law judge erred in relying on the opinion of Dr. Baker to find that disability was due to pneumoconiosis inasmuch as Dr. Baker merely relied upon claimant's history of occupational exposure and positive x-ray evidence to support his finding. Employer also contends that Dr. Baker's conclusions were equivocal because he found that both smoking and coal mine employment were possible etiologies and that he could not separate their effects. Further, employer argues that while the administrative law judge determined that claimant established a smoking history of sixty-two to sixty-six pack-years and found that Dr. Baker's smoking history was consistent with this determination, in the prior decision denying benefits, Judge Hillyard had found that claimant had a 112 pack-year smoking history. Thus, employer asserts Dr. Baker's opinion was unreasoned as it was based on a deflated smoking history. Employer further asserts that the administrative law judge was without authority to revisit the smoking history issue.

In finding that claimant established disability causation pursuant to Section 718.204(c), the administrative law judge first found that because Dr. Fino failed to diagnose the existence of pneumoconiosis, his opinion that claimant's disability was unrelated to pneumoconiosis or coal dust exposure was entitled to little weight on the issue of disability

causation. Decision and Order at 12-13. The administrative law judge next found Dr. Westerfield's opinion that claimant's totally disabling respiratory impairment was not caused or contributed to by coal dust exposure entitled to little weight as the opinion was unreasoned since Dr. Westerfield did not cite to the medical evidence he relied upon in reaching his medical determination, nor did he explain why he found Dr. Baker's conclusions inaccurate. *Id*.

Turning to the opinion of Dr. Baker, the administrative law judge concluded that Dr. Baker's opinion, that claimant's totally disabling respiratory impairment was due to the effects of both coal mine dust exposure and cigarette smoking supported a finding of disability causation as the physician's conclusions were well-reasoned and well-documented, *i.e.*, the doctor considered claimant's x-ray, pulmonary function study, symptomatology, length of coal mine employment and smoking, and medical journals. Decision and Order at 13-14. Accordingly, giving the greatest weight to the opinion of Dr. Baker, the administrative law judge found that it established that claimant's totally disabling respiratory impairment was due to pneumoconiosis pursuant to Section 718.204(c). This was proper.

Contrary to employer's assertions, the administrative law judge permissibly accorded less weight to the opinion of Dr. Westerfield because the physician failed to provide a well-reasoned opinion and failed to fully explain his conclusions on the issue of disability causation. As the administrative law judge stated, Dr. Westerfield reviewed Dr. Baker's opinion which attributed claimant's disability to pneumoconiosis, but Dr. Westerfield did not explain why he believed that Dr. Baker's opinion did not contain enough evidence to support a finding of causation. *See Collins v. J & L Steel*, 21 BLR 1-181, 1-191 (1999); *Beatty v. Danri Corp*., 16 BLR 1-11, 1-13-14 (1991); *Clark v. Karst-Robbins Coal Co.*, 12 BLR 1-149 (1989) (*en banc*); *Peskie v. United States Steel Corp.*, 8 BLR 1-126 (1985); *Lucostic v. United States Steel Corp.*, 8 BLR 1-46 (1985). Likewise, contrary to employer's assertion, the administrative law judge permissibly accorded less weight to the opinion of Dr. Fino regarding disability causation as that physician failed to diagnose the existence of pneumoconiosis. *See Stark v. Director, OWCP*, 9 BLR 1-36 (1986) (administrative law judge may assign less weight to opinion of a physician with less than complete picture of miner's health); *see also Hutchens v. Director, OWCP*, 8 BLR 1-16 (1985). The administrative law judge's rationale is not compromised by the fact that Dr. Fino stated that: even assuming the existence of pneumoconiosis, it would not have contributed to any impairment. *See Scott v. Mason Coal Co.*, 289 F.3d 263, 22 BLR 2-372 (4th Cir. 2002); *Toler v. Eastern Assoc. Coal Co.*, 43 F.3d 109, 19 BLR 2-70 (4th Cir. 1995); *see also Stark*, 9 BLR 1-36; *Hutchens*, 8 BLR 1-16. Likewise, the administrative law judge permissibly credited the opinion of Dr. Baker as he found it both well-documented and well-reasoned. Additionally, contrary to employer's argument, the fact that Dr. Baker could not separate the effects of claimant's smoking and coal mine employment does not render it equivocal. *See Gross v. Dominion Coal Corp.*, 23 BLR 1-8, 1-18-19 (2003) (doctor's opinion which states that pneumoconiosis was one of two causes of claimant's totally disabling respiratory

condition is sufficient to establish that pneumoconiosis is a substantially contributing cause of claimant's total respiratory disability).

Further, we reject employer's assertion that the 112 pack year smoking history found by Judge Hillyard is binding in this subsequent claim. 20 C.F.R. §725.309(d)(4). The administrative law judge is required to engage in a *de novo* review of newly submitted evidence and if, as in this case, such evidence establishes a different smoking history than that relied upon by the prior administrative law judge, the administrative law judge may, in his discretion, rely upon a corrected history. *See Kuchwara v. Director, OWCP*, 7 BLR 1-167 (1984).

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

SO ORDERED.

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ROY P. SMITH
Administrative Appeals Judge

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REGINA C. McGRANERY
Administrative Appeals Judge

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BETTY JEAN HALL
Administrative Appeals Judge