Commonwealth of Kentucky
Workers' Compensation Board

OPINION ENTERED: October 8, 2013

CLAIM NO. 201200330

LARRY HAYDEN PETITIONER

VS. **APPEAL FROM HON. R. SCOTT BORDERS, ADMINISTRATIVE LAW JUDGE**

CALVERT CITY METALS AND ALLOYS
and HON. R. SCOTT BORDERS,
ADMINISTRATIVE LAW JUDGE RESPONDENTS

OPINION
AFFIRMING IN PART, VACATING IN PART,
AND REMANDING
* * * * * *

BEFORE: ALVEY, Chairman, STIVERS and RECHTER, Members.

STIVERS, Member. Larry Hayden ("Hayden") seeks review of the June 14, 2013, opinion, order, and award of Hon. R. Scott Borders, Administrative Law Judge ("ALJ") dismissing his claim for income and medical benefits against Calvert City Metals and Alloys ("Calvert City") for all alleged injuries occurring on August 15, 2011, except for an award

of medical benefits for injuries to his mouth. Hayden did not file a petition for reconsideration.

On appeal, Hayden takes issue with the ALJ's reliance upon the opinions of Calvert City's physicians and argues the ALJ's findings are completely erroneous and grossly unjust.

Hayden's Form 101 alleges he tripped over an object while descending metal steps causing him to fall head first approximately fifteen feet. As a result, he alleged injuries to his head and neck, as well as a hearing impairment, dental damage, back and leg pain, and eye irritation.

The April 19, 2013, benefit review conference ("BRC") order and memorandum reflects the parties stipulated Hayden sustained a work-related injury on August 15, 2011, and due and timely notice was given. The parties also stipulated to the medical expenses paid, Hayden's average weekly wage, date of birth, education level, and lack of specialized or vocational training. The contested issues were "benefits per KRS 342.730, work-relatedness/causation, unpaid or contested medical expenses, injury as defined by the Act, credit for salary continuation, and TTD."

Hayden testified that while going down some metal steps he tripped and fell to the bottom of the steps. He was unable to remember the distance he fell. Hayden was transported by ambulance to Western Baptist Hospital and was eventually referred to Dr. Joseph Ashburn, a neurologist. Dr. Ashburn referred him to Dr. R. Gordon Williams, a Ph.D. psychologist. Dr. Williams referred him to Dr. Adams, a psychiatrist in the same office. Hayden also saw Dr. Mahan, a dentist, for the injury to his teeth and mouth and Dr. James E. Zellmer for his hearing problems. Prior to the injury, Hayden had been treated by Dr. James H. Long who continued to treat him for his current problems.

Hayden testified his hearing and vision have been affected, and he experiences pain extending from his ears to his hands and sometimes into his fingers. He also has middle and lower back and right leg problems. He experiences headaches and dizzy spells. Hayden testified he is unable to help with household chores and cannot perform any of the yard work. He drives very little. Hayden believes his condition continues to worsen.

Hayden introduced impairment ratings from three physicians. One impairment rating was provided by Dr. Long in an undated document styled Workers' Compensation

Statement, upon which it appears Dr. Long wrote the following diagnoses: 1) Lumbar disc disease and sciatica; 2) Depression; 3) Post concussion syndrome with cognitive impairment; 4) Post concussion headaches; 5) Abdominal pain; 6) Hypertension. The Workers' Compensation Statement requested Dr. Long to fill in an impairment rating related to the above diagnosis which was based on the "most recent edition of the AMA Guidelines." Dr. Long wrote Hayden's whole body impairment rating is 30% to 69%.

Dr. Williams also completed an undated Workers' Compensation Statement. Dr. Williams wrote his diagnoses of the conditions for which he rendered treatment: "1. (394.9) Cognitive Disorder, NOS; 2. (293.83) Mood Disorder due to recent head trauma injury." With respect to the impairment rating related to his diagnosis and based on "the most recent edition of the AMA Guidelines," Dr. Williams wrote 30% to 69%.

Calvert City introduced Dr. Williams' November 8, 2012, deposition. Dr. Williams testified he first saw Hayden on October 25, 2011, and sent him to Dr. Christopher Adams, who continues to provide medication therapy for Hayden's "nervous issues." Dr. Williams acknowledged he did not administer any standardized tests and therefore there are no validity indicators. He assumed he utilized

the 5th Edition of the American Medical Association, Guides to the Evaluation of Permanent Impairment ("AMA Guides") when he assessed the impairment rating, but could not provide the chapter and table he relied upon in making his assessment. Further, he was unaware Kentucky had not adopted the 6th Edition of the American Medical Association, Guides to the Evaluation of Permanent Impairment ("6th Edition"). He could not remember if he referred to the 2nd Edition of the AMA Guides in arriving at the 30% to 69% and did not remember when he completed the form filed in the record. Significantly, Dr. Williams did not know whether Hayden had reached maximum medical improvement ("MMI") explaining it was too early to tell. Dr. Williams acknowledged he was unfamiliar with the section of the 5th Edition of the AMA Guides which stated impairment ratings should not be assessed until MMI had been attained. He believed the impairment rating was based upon Hayden's condition at the time he completed the form. Dr. Williams explained:

> Q: Would it be fair to say then that you can't tell us that this 30 to 69 percent impairment rating is actually a permanent impairment rating?
>
> A: Well, it's where he was when I filled that out. And whether or not he will be at that level a year from now or two years from now, there is no way

> to know. Again, this document – I'll sound defensive, but I was asked to fill this document out when I was asked to fill it out, and I went ahead and filled it out.
>
> If the standards say they want you to wait until maximum medical benefits have been reached, then we would need to fill it out at some later point whenever he's reached that point. So I don't know.

Like Dr. Williams, Dr. Ashburn completed an undated Workers' Compensation Statement. Dr. Ashburn wrote his diagnosis was traumatic brain injury. Dr. Ashburn wrote the impairment rating related to his diagnosis pursuant to "the most recent edition of the AMA Guidelines" is 70%. Dr. Ashburn was unable to provide a specific reference to a section of the AMA Guides, inserting "XXXX" in the blank.

Calvert City introduced the February 5, 2013, deposition of Dr. Ashburn. Dr. Ashburn testified he first saw Hayden on August 22, 2011, and last saw him on September 4, 2012. He acknowledged two CT scans, an MRI, and an EEG of the brain produced normal results and his diagnosis of post-concussion syndrome was based solely on subjective complaints. Dr. Ashburn was not asked to complete a Form 107 and testified his impairment rating of 70% was not based upon the 5th Edition of the AMA Guides,

and he did not consult the AMA Guides in assessing the impairment rating.

Calvert City introduced the September 28, 2012, report of Dr. Andrew Cooley who is board certified in general and forensic psychiatry. Dr. Cooley's report reveals he received from Hayden a history of the accident and a description of how the accident affected him mentally. Dr. Cooley also obtained Hayden's past medical, family, and social history. Over a period of two days, Dr. Cooley conducted a mental examination which included "a face to face mental status examination" and "the administration and interpretation of standardized mental test instruments." Dr. Cooley also conducted a neurological examination. Dr. Cooley provided the following diagnoses:

> Axis I
> 1. Symptom exaggeration of psychological problems (malingering vs factitious disorder)
> 2. Malingering of cognitive effort
> 3. Rule out depression
> 4. opiate dependency
>
> Axis II - Unable to opine secondary to symptom exaggeration
>
> Axis III - Status-post August 15, 2011 injury with reports of chronic pain
>
> Axis IV - Psychosocial stressors of litigation stress

Axis V - Unable to opine

Dr. Cooley's conclusions were as follows:

> In my opinion, within reasonable medical probability, Mr. Larry Hayden has an undetermined whole body psychiatric impairment due to the accident in question. I am unable to opine any impairment secondary to problems with his psychological symptom exaggeration (malingering/factitious) and his problems with cognitive effort. This is based on Guides to the Evaluation of Permanent Impairment, American Medical Association, 1984 and 1993, and 2000.

Dr. Cooley provided the results of the tests administered as well as his observations during the neurological examination. With respect to whether Hayden had a whole person impairment for a condition which can be attributable to the August 15, 2011, injury, Dr. Cooley stated as follows:

> I am unable to opine any whole person impairment because of the significant amount of signal to noise ratio in his evaluation. The amount of symptom magnification and problems with effort precludes the accurate determination of any sort of impairment. He may have a mild impairment but I am unable to opine what this may be secondary to problems with effort and validity.

Concerning Hayden's ability to return to work, Dr. Cooley opined:

> I would not currently recommend that. He is heavily invested in a sick role.

> He has pursued retirement/disability options. He does not believe that he would be able to return to work and states he has no plans of doing this. The true measure of his cognitive ability is difficult for me to say because of his problems with effort and validity.

Calvert City introduced the August 1, 2012, report of Dr. Michael Best generated after conducting a physical examination and a functional capacity examination. Dr. Best obtained a history of the injury, a past medical history, a social history, and employment information. After conducting a physical examination and reviewing the functional capacity evaluation, Dr. Best provided the following diagnosis:

> Work-related fall August 15, 2011, with:
> a. Soft tissue cervical sprain/strain – resolved.
> b. Soft tissue lumbosacral sprain/strain – resolved.
> c. History of chronic low back pain with sciatica.
> d. Symptom magnification versus malingering.
> e. Chronic depression.

Dr. Best noted that after being treated at the hospital, Hayden was seen by numerous physicians and no specific abnormality was detected. Dr. Best stated Hayden had a history of degenerative disc disease with an EMG nerve conduction study in 2009 demonstrating sciatica.

Hayden also had a chronic history of depression. The MRI of the cervical spine revealed no acute disc herniation and an MRI of the brain was normal. A repeat CT scan of the brain was normal. The MRI of the lumbar spine revealed no disc herniation or nerve root impingement. Dr. Best believed Hayden provided submaximal and inconsistent efforts during his physical examination. Similarly, the functional testing demonstrated submaximal and inconsistent efforts. Following his examination, Dr. Best recommended Hayden undergo a neurological psychiatric examination which was performed on September 13 and 14, 2012.

Dr. Best stated Hayden had suffered soft tissue sprain/strain/contusions. He concluded after one year and significant amounts of diagnostic testing, there is no objective evidence a permanent harmful change to the human organism occurred. Therefore, he believed Hayden had not sustained an injury. Dr. Best believed Hayden's prognosis was poor because he markedly overreacts, and as revealed by the neuropsychiatric examination he has "significant malingering/factitious disorder/symptom magnification." He believed Hayden reached MMI. Dr. Best concluded Hayden had a prior active impairment which he characterized as depression and chronic low back pain/sciatica. Based on

the 5th Edition of the AMA Guides, Dr. Best assessed a 0% impairment.

Concerning Hayden's alleged neck, head, and back injury, the ALJ entered the following findings of fact and conclusions of law:[1]

> In regard to the Plaintiff's claim that he suffered injury to his neck, back, and legs, the only medical proof submitted into the record specifically addressing these body parts comes from Dr. Michael Best who opined that Plaintiff did not suffer a harmful change to the human organism to his neck, back, and leg, as a result of the August 15, 2011, work-related incident. In addition, the Plaintiff did not submit any competent medical proof substantiating his allegations that he suffered an injury to his neck, back, and legs as a result of the August 15, 2011, and therefore his claim for Worker's Compensation benefits for alleged back, neck, and leg injury shall likewise be dismissed.

Concerning Hayden's claim for a closed head or brain injury, the ALJ entered the following findings of fact and conclusions of law:

> The Plaintiff has alleged that as a result of the August 15, 2011, work-related fall he suffered a closed head trauma/traumatic brain injury as well as suffering significant injury to his mouth consisting of fracturing teeth,

[1] Although Hayden listed a hearing impairment and an eye irritation in his Form 101, since there was no proof to support either allegation of alleged injuries, the ALJ dismissed Hayden's claim for both. Notably, Hayden does not appeal the ALJ's decision on these issues.

damaging his bridge, necessitating dental treatment.

In regards [sic] to the claimant's allegations that he suffered a closed head trauma/traumatic brain injury, the Plaintiff testified that he has difficulty with exposure to light and must wear sunglasses, he alleges he suffers from marked depression difficulty concentrating, and has cognitive impairment. He supports his position with testimony from Dr. Winkler, Dr. Ashburn, Dr. Williams, Dr. Long, Dr. Amble, and Dr. Adams.

Dr. Ashburn, in fact assessed him a 70% functional impairment rating as a result of his closed head trauma while Dr. Williams assesses a 30 – 69% functional impairment rating as [sic] result of his closed head trauma. Dr. Long likewise assesses the Plaintiff the 30 – 69% functional impairment rating but there is no indication in his report what body parts this impairment rating is assessed for.

The Defendant Employer argues that Plaintiff has not met his burden of proving that he suffered a closed head trauma/traumatic brain injury as a result of the August 15, 2011 fall. In support of their position the Defendant Employer submitted proof from Dr. Andrew Cooley, a forensic psychiatrist, who had the Plaintiff undergo a two day psychiatric evaluation that consisted of a battery of psychological testing, a thorough review of his medical records including diagnostic studies, and a detailed mental status examination.

Dr. Cooley opined that Plaintiff is suffering from either symptom magnification or factitious pain behavior as his evaluation was replete

with inconsistencies and other intentional or subconscious exaggeration of his symptoms. Dr. Cooley opined that Plaintiff did not suffer a closed head trauma or traumatic brain injury as a result of the August 15, 2011, work-related fall.

In this specific instance, the Administrative Law Judge had the opportunity to observe the Plaintiff during the Final Hearing held herein and did not find his testimony to be credible. In fact, the Plaintiff based on the observations of the undersigned Administrative Law Judge appeared to be functioning normally and was cognizant of his situation and did not outwardly exhibit any signs of a person suffering from cognitive difficulties.

In addition, after careful review [sic] the medical records, the Administrative Law Judge did not find the testimony of Dr. Ashburn or Dr. Williams to be credible as they did not have the opportunity to perform extensive testing as did Dr. Cooley and neither Dr. Ashburn or Dr. Williams assessed the functional impairment rating pursuant to the AMA Guides. In fact, both Dr. Ashburn and Dr. Williams based their diagnosis purely on the Plaintiff's subjective complaints which as previously mentioned the Administrative Law Judge does not find to be credible.

The Administrative Law Judge does find the opinion of Dr. Cooley to be extremely credible and in fact relies upon the same in finding that Plaintiff has not met his burden of proving that he suffered a closed head injury/traumatic brain injury as a result of the August 15, 2011, work-related incident and therefore his claim

> for Worker's Compensation benefits regarding the same shall be dismissed in its entirety.

Based on the uncontradicted opinions of Dr. Mahan, the ALJ determined Hayden had proven a work-related injury to his mouth which required dental work to repair broken teeth and/or a broken bridge. However, the ALJ concluded Hayden failed to submit any medical evidence to justify an award of permanent partial disability benefits as a result of the injuries. Consequently, the ALJ believed only an award of future medical benefits for the treatment of Hayden's mouth as set forth in Dr. Mahan's report was required. The ALJ dismissed Hayden's claim for alleged injuries to his head, neck, and back as well as his claim for hearing impairment, leg pain, and eye irritation. The ALJ also dismissed Hayden's claim for income benefits for the dental injuries which occurred on August 15, 2011, work-related fall. The ALJ awarded medical benefits for the treatment of the injuries to Hayden's mouth which consisted of dental work recommended by Dr. Mahan. As previously noted, Hayden filed no petition for reconsideration.

On appeal, Hayden contends all of the physicians who treated him were not physicians of his choosing. He notes he was referred to Dr. Ashburn who referred him to Drs. Williams and Adams. Hayden also notes he was referred

to various physicians by the "Railroad Administration" and every physician found he suffered from psychological problems as a result of the August 15, 2011, injury and restricted him from working. Hayden maintains Calvert City sought evaluations by two doctors in Nashville, Tennessee, and rather than file those reports it obtained evaluations from Louisville physicians. Hayden argues the ALJ's implication his claim is without merit because there was no physical injury is contrary to established law. Hayden points out the parties stipulated he sustained an injury. Hayden argues the ALJ's characterization of his physicians' impairment ratings as "incredible," completely disregards the fact these were treating physicians to whom he was referred. Hayden also argues the ALJ completely disregarded the fact Calvert City "handpicked" his evaluators and never filed the reports of the Nashville physicians. Accordingly, he contends the ALJ's decision should be reversed.

It is well established a claimant in a workers' compensation claim bears the burden of proving each of the essential elements of his cause of action. Burton v. Foster Wheeler Corp., 72 S.W.3d 925 (Ky. 2002). Since Hayden was unsuccessful in his burden of proof before the ALJ, the question on appeal is whether, upon consideration of the whole record, the evidence compels a finding in his

favor. Wolf Creek Collieries v. Crum, 673 S.W.2d 735 (Ky. App. 1984). Compelling evidence is defined as evidence that is so overwhelming that no reasonable person could reach the same conclusion as the ALJ. REO Mechanical v. Barnes, 691 S.W.2d 224 (Ky. App. 1985). As a fact-finder, the ALJ has the sole authority to determine the quality, character, and substance of the evidence. Square D Company v. Tipton, 862 S.W.2d 308 (Ky. 1993); Paramount Foods, Inc. v. Burkhardt, 695 S.W.2d 418 (Ky. 1985). The ALJ alone has the discretion to judge the weight to be accorded to and inferences to be drawn from the evidence. Miller v. East Kentucky Beverage/Pepsico, Inc., 951 S.W.2d 329 (Ky. 1997); Luttrell v. Cardinal Aluminum Co., 909 S.W.2d 334 (Ky. App. 1995). The ALJ may reject any testimony and believe or disbelieve various parts of the evidence, regardless of whether it comes from the same witness or the same adversary parties' total proof. Magic Coal Co. v. Fox, 19 S.W.3d 88 (Ky. 2000); Whittaker v. Rowland, 998 S.W.2d 479 (Ky. 1999); Halls Hardwood Floor Co. v. Stapleton, 16 S.W.3d 327 (Ky. App. 2000).

Furthermore, in the absence of a petition for reconsideration, on questions of fact, the Board is limited to a determination of whether there is substantial evidence contained in the record to support the ALJ's conclusion.

Stated otherwise, inadequate, incomplete, and even inaccurate fact finding on the part of an ALJ will not justify reversal or remand if there is identifiable evidence in the record that supports the ultimate conclusion. Eaton Axle Corp. v. Nally, 688 S.W.2d 334 (Ky. 1985); Halls Hardwood Floor Co. v. Stapleton, supra.

In this case, substantial evidence supports the ALJ's finding Hayden failed in his burden of showing he sustained a permanent impairment sufficient to justify the award of income benefits. The ALJ found more credible the opinions of Dr. Best who concluded at best Hayden sustained a soft tissue sprain/strain/contusion which pursuant to the AMA Guides merited a 0% impairment rating. Clearly, Dr. Best's opinions constitutes substantial evidence in support of the ALJ's determination Hayden did not sustain a physical injury sufficient to justify an award of income and medical benefits.

Just as significant is the fact Dr. Long based his impairment rating on the most recent edition of the AMA Guides. We take notice the most recent edition of the AMA Guides is the 6th Edition and not the 5th Edition. Since the statute mandates an impairment rating must be based on the 5th Edition of the AMA Guides, Dr. Long's assessment of an impairment could not be relied upon by the ALJ. The same

holds true for Dr. Ashburn's impairment rating as his undated statement reveals his impairment rating is based upon the most recent edition of the AMA Guides. In addition, Dr. Ashburn's testimony reveals he did not consult or utilize the 5th Edition of the AMA Guides in assessing an impairment rating. Consequently, the ALJ was prohibited from relying upon the impairment rating of Dr. Ashburn.

We agree, in part, with Hayden with respect to the ALJ's decision regarding the existence of a cognitive or psychological impairment resulting from a work-related head injury. Although Hayden did not specifically allege a psychological injury as evidenced by the medical proof, the parties clearly treated the allegation of a head injury as including a psychological injury. We find no error in the ALJ's decision not to assign any credibility to Dr. Williams' impairment rating for a cognitive or psychological injury. As previously noted, Dr. Williams was unable to provide the chapter or table upon which he relied in assessing an impairment rating and was not aware Kentucky had not adopted the 6th Edition of the AMA Guides. Dr. Williams assumed his impairment rating was assessed pursuant to the 5th Edition of the AMA Guides, but was not sure whether he consulted the 2nd Edition of the AMA Guides in

arriving at the impairment rating. Finally, Dr. Williams' testimony can only be interpreted as demonstrating Hayden had not attained MMI when the impairment rating was assessed. Thus, there are no impairment ratings in the record which can constitute the basis for an award of income benefits for a cognitive or psychological injury resulting from the head injury. Therefore, substantial evidence supports the ALJ's refusal to award income benefits as a result of a head injury caused by the work injury.

That said, based on Dr. Cooley's opinions, we conclude the ALJ erred in dismissing in total Hayden's head injury claim as he may be entitled to an award of medical benefits for a cognitive or psychological injury. Dr. Williams diagnosed cognitive and mood disorders due to the head injury. Thus, Dr. Cooley's opinions may also support a determination Hayden sustained a work-related cognitive and/or psychological injury sufficient to justify an award of future medical benefits. As recited herein, Dr. Cooley concluded Hayden had an undetermined whole body psychological impairment but was unable to determine the impairment because of Hayden's "symptom exaggeration" and "problems with cognitive effort." Later in his report, Dr. Cooley stated he was unable to opine a whole person impairment because of the amount of symptom magnification

and problems with effort which precluded an accurate determination of any sort of impairment. Dr. Cooley explained Hayden may have a “mild impairment” but he was unable to provide the impairment rating because of Hayden’s actions.

The ALJ relied upon the opinion of Dr. Cooley in determining Hayden had not proven he suffered a closed head injury or traumatic brain injury as a result of the August 15, 2011, event. However, in relying upon Dr. Cooley the ALJ failed to discuss Dr. Cooley’s opinion that Hayden may have an impairment as a result of the August 15, 2011, injury. Clearly, Dr. Cooley was not able to provide an impairment rating, and as Hayden had the burden of establishing an impairment rating for this cognitive or psychological injury, the ALJ did not err in dismissing Hayden’s claim for income benefits for a cognitive or psychological injury. In a proper exercise of his discretion, the ALJ refused to give any credence to Dr. Williams’ opinions and instead relied upon Dr. Cooley’s opinions. Since Dr. Cooley declined to assess an impairment rating there is no basis for an award of income benefits for a psychological or cognitive injury. However, since Dr. Cooley stated Hayden may have an impairment as a result of the August 15, 2011, event, that portion of the ALJ’s

opinion, order, and award dismissing in total Hayden's claim for a head injury, and denying future medical benefits for a cognitive or psychological impairment must be vacated and remanded to the ALJ for additional findings of fact as to whether Hayden sustained a head injury which resulted in impairment sufficient to justify an award of future medical benefits pursuant to FEI Installation, Inc. v. Williams, 214 S.W.3d 313 (Ky. 2007).

In FEI Installation, Inc. v. Williams, supra, the Supreme Court instructed that KRS 342.020(1) does not require proof of an impairment rating to obtain future medical benefits, and the absence of a functional impairment does not necessarily preclude such an award. Here, we believe the ALJ failed to consider whether Hayden sustained a cognitive or psychological injury which, although not justifying an award of income benefits, merited the award of future medical benefits.

As to Hayden's argument the parties stipulated he sustained an injury, we note that although the parties stipulated to the injury, the BRC order also reflects injury as defined by the Act was a contested issue. Therefore, since injury as defined by the Act was an issue the ALJ was required to determine the nature of the injury Hayden sustained on November 15, 2011. The fact the parties

stipulated an injury occurred does not require a finding favorable to Hayden on all aspects of the extent of the injury or injuries. Similarly, the fact the ALJ did not rely upon the treating physicians' opinions and instead relied upon the evaluating physicians' opinions is of no consequence as the law is well settled that the ALJ is not required to give more weight to the opinions of the treating physicians. Wells v. Morris, 698 S.W.2d 321 (Ky. App. 1985).

Accordingly, those portions of the June 14, 2013, opinion, order, and award dismissing Hayden's claim for income and medical benefits for injuries to his neck and back and for a hearing impairment, leg pain, and eye irritation are **AFFIRMED**. Further, the portion of the opinion, order, and award denying income benefits for a head injury including a cognitive or psychological impairment, is **AFFIRMED**. However, that portion of the ALJ's decision denying medical benefits for the head injury is **VACATED**. This claim is **REMANDED** to the ALJ for a determination of whether Hayden is entitled to an award of future medical benefits pursuant to KRS 342.020 for a cognitive or psychological impairment due to the head injury in conformity with the views expressed herein.

ALL CONCUR.

COUNSEL FOR PETITIONER:

HON WILLIAM F MCGEE JR
P O BOX 39
SMITHLAND KY 42081

COUNSEL FOR RESPONDENT:

HON A STUART BENNET
P O BOX 2150
LEXINGTON KY 40588

ADMINISTRATIVE LAW JUDGE:

HON R SCOTT BORDERS
8120 DREAM STREET
FLORENCE KY 41042