

SUPREME COURT OF ARKANSAS

Edmisten v. Bull Shoals Landing

2014 Ark. 89 (2014) · No. CV-12-75 · Decided February 27, 2014

SUMMARY

The Arkansas Supreme Court reversed and remanded an Arkansas Workers’ Compensation Commission decision denying Matthew Edmisten benefits after a workplace drum explosion. The court held that the Commission’s finding that Edmisten failed to rebut the statutory presumption linking the accident to illegal-drug use was not supported by substantial evidence. The court vacated the court of appeals’ opinion and declined to reach Edmisten’s constitutional challenges to the Commission’s structure.

CASE DETAILS

COURT	Supreme Court of Arkansas
WRITING FOR THE COURT	Jim Hannah, Chief Justice; Judson Kidd, Special Justice; Tjuana Byrd, Special Justice; Karen R. Baker, Justice; Courtney Hudson Goodson, Justice
JURISDICTION	Arkansas
DECIDED	February 27, 2014
DOCKET	CV-12-75
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from an Arkansas Workers’ Compensation Commission decision denying benefits; the Arkansas Court of Appeals affirmed, and the Supreme Court of Arkansas granted review.
STANDARD OF REVIEW	When the Commission denies coverage because the claimant failed to meet his burden of proof, the appellate court affirms if the Commission’s opinion displays a substantial basis for denial of relief. The court will not reverse unless fair-minded persons with the same facts could not have reached the Commission’s conclusion. When the Commission adopts the ALJ’s findings, the appellate court reviews both the ALJ’s and Commission’s decisions.
PRECEDENTIAL VALUE	Published Arkansas Supreme Court opinion; precedential.
PARTIES	Matthew L. Edmisten v. Bull Shoals Landing, AIG Domestic Claims, Inc.

TOPICS

workers compensation

administrative law

standard of review

appellate procedure

statutory interpretation

PRACTICE AREAS

workers compensation

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constitutional law

QUESTIONS PRESENTED

1. Whether substantial evidence supported the Workers' Compensation Commission's finding that Edmisten failed to rebut the statutory presumption that his accident was substantially occasioned by illegal-drug use.
2. Whether the structure of the Arkansas Workers' Compensation Commission violated separation-of-powers principles or Edmisten's procedural and substantive due-process rights.

HOLDINGS

1. The Commission's decision was not supported by substantial evidence because the evidence did not establish a direct causal link between Edmisten's marijuana use and the accident, and the Commission arbitrarily disregarded testimony and other evidence supporting his claim.
2. The court did not reach the constitutional challenge because the case could be resolved on the substantial-evidence issue.

KEY QUOTATIONS

"The Commission may not arbitrarily disregard the testimony of any witness and, likewise, the Commission may not arbitrarily disregard other evidence submitted in support of a claim." (14)

"We conclude that the Commission's decision that Edmisten failed to rebut the presumption that his accident was not substantially occasioned by the use of illegal drugs is not supported by substantial evidence." (15)

FACTUAL BACKGROUND

On November 1, 2007, Matthew Edmisten was injured while holding the lid of a fifty-five-gallon drum as a coworker cut the drum with an acetylene torch; the drum exploded and severely burned both men. Edmisten tested positive for marijuana metabolites after the accident. The ALJ and Commission concluded that Edmisten failed to rebut the statutory presumption that the accident was substantially occasioned by illegal-drug use, while the record also contained testimony that he did not appear intoxicated and that the coworker had routinely used a cutting torch to open barrels.

PROCEDURAL HISTORY

The administrative law judge found that Edmisten failed to rebut the statutory presumption that his workplace accident was substantially occasioned by illegal-drug use. The Workers' Compensation Commission adopted the ALJ's findings and denied benefits. The Arkansas Court of Appeals affirmed, after which the Supreme Court of Arkansas granted review, reversed the Commission's decision, and vacated the court of appeals' opinion.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the Workers' Compensation Commission's decision and remand for a determination of benefits; vacate the Arkansas Court of Appeals' opinion.

CASES CITED

- Prock v. Bull Shoals Boat Landing, 2014 Ark. 93, 431 S.W.3d 858
- Pack v. Little Rock Convention Ctr. & Visitors Bureau, 2013 Ark. 186, 427 S.W.3d 586
- ERC Contractor Yard & Sales v. Robertson, 335 Ark. 63, 977 S.W.2d 212 (1998)
- Ester v. Nat'l Home Ctrs., Inc., 335 Ark. 356, 981 S.W.2d 91 (1998)
- Hickman v. Kellogg, Brown & Root, 372 Ark. 501, 277 S.W.3d 591 (2008)
- Pickens-Bond Constr. Co. v. Case, 266 Ark. 323, 584 S.W.2d 21 (1979)
- Hudak-Lee v. Baxter Cnty. Reg'l Hosp., 2011 Ark. 31, 378 S.W.3d 77 (2012)
- Ozark Natural Food v. Pierson, 2012 Ark. App. 133, 389 S.W.3d 105 (2012)
- Titan Oil & Gas, Inc. v. Shipley, 257 Ark. 278, 517 S.W.2d 210 (1974)
- Smith v. Magnet Cove Barium Corp., 212 Ark. 491, 206 S.W.2d 442 (1947)
- Freeman v. Con-Agra Frozen Foods, 344 Ark. 296, 40 S.W.3d 760 (2001)
- Dotson v. City of Lowell, 375 Ark. 89, 289 S.W.3d 55 (2008)