

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Johnathan G. v. Frank Bisignano, Commissioner of the Social Security Administration

Johnathan G. · No. Civ. No. 24-1278 GBW · Decided November 24, 2025

SUMMARY

The United States District Court for the District of New Mexico denies Plaintiff Johnathan G.’s motion to remand and affirms the Commissioner of the Social Security Administration’s denial of SSDI and SSI benefits. The court concludes that the ALJ adequately evaluated Plaintiff’s subjective symptoms, the alleged need for a handheld assistive device, and his non-severe mental impairments, and that the decision was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	B. Wormuth
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	November 24, 2025
DOCKET	Civ. No. 24-1278 GBW
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his applications for Social Security Disability Insurance and Supplemental Security Income benefits. The court considered Plaintiff's motion to reverse and remand.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court reviews whether the Commissioner's decision is supported by substantial evidence and whether the correct legal standards were applied. The court may not reweigh the evidence or substitute its judgment for that of the agency.
PRECEDENTIAL VALUE	Unpublished federal district court order; precedential status unknown
PARTIES	Johnathan G. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Plaintiff's subjective symptom allegations and whether that evaluation was supported by substantial evidence.
2. Whether the ALJ adequately explained the determination that a cane or walker was not medically necessary and therefore need not be included in the residual functional capacity.
3. Whether the ALJ adequately considered Plaintiff's non-severe anxiety and post-traumatic stress disorder when formulating the residual functional capacity.

HOLDINGS

1. The ALJ adequately evaluated the intensity, persistence, and limiting effects of Plaintiff's symptoms, provided a reasoned explanation linked to evidence in the record, and reached findings supported by substantial evidence.
2. The ALJ's explanation that the evidence did not establish the medical necessity of a cane or walker satisfied the minimum articulation requirement, and remand was not warranted.
3. The ALJ adequately considered Plaintiff's non-severe anxiety and post-traumatic stress disorder, and the omission of additional mental restrictions from the RFC did not require reversal.

KEY QUOTATIONS

"In reviewing the ALJ's decision, [the Court] neither reweigh[s] the evidence nor substitute[s] [its] judgment for that of the agency." (at 4)

"Substantial evidence is more than a mere scintilla. It means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." (at 4)

"Though not technically perfect, the ALJ's decision contains a proper analysis of Plaintiff's symptoms and a reasoned explanation for discrediting some of Plaintiff's subjective complaints." (at 16)

"Though the ALJ could have been more explicit in tying his assessment of Plaintiff's mild mental limitations to the final RFC, the Court can follow the reasoning." (at 20)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on left-eye blindness, facial pain and numbness, jaw impairment following surgery, difficulty speaking, and mental impairments including anxiety and post-traumatic stress disorder. The ALJ found severe impairments involving left-eye blindness and the left mandible, but found the mental impairments non-severe and determined that a cane or walker was not medically necessary. The ALJ

assessed a restricted light-work residual functional capacity and found that Plaintiff could perform several jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for SSDI and SSI benefits in October 2020. After initial denial and denial on reconsideration, an ALJ denied the applications; the Appeals Council remanded once to the ALJ, who again denied benefits after a second hearing. The Appeals Council denied further review, making the ALJ's decision the Commissioner's final decision. Plaintiff filed this action, and the district court denied remand and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Casias v. Secretary of Health & Human Services*, 933 F.2d 799, 800-01 (10th Cir. 1991)
- *Bowman v. Astrue*, 511 F.3d 1270, 1272 (10th Cir. 2008)
- *Clifton v. Chater*, 79 F.3d 1007, 1009-10 (10th Cir. 1996)
- *Lax v. Astrue*, 489 F.3d 1080, 1084 (10th Cir. 2007)
- *Grogan v. Barnhart*, 399 F.3d 1257, 1261 (10th Cir. 2005)
- *Winfrey v. Chater*, 92 F.3d 1017, 1023-25 (10th Cir. 1996)
- *Wells v. Colvin*, 727 F.3d 1061, 1065 (10th Cir. 2013)
- *Wall v. Astrue*, 561 F.3d 1048, 1067, 1070 (10th Cir. 2009)
- *Frantz v. Astrue*, 509 F.3d 1299, 1303 (10th Cir. 2007)
- *Kepler v. Chater*, 68 F.3d 387, 391 (10th Cir. 1995)
- *Qualls v. Apfel*, 206 F.3d 1368, 1372 (10th Cir. 2000)
- *Howard v. Barnhart*, 379 F.3d 945, 949 (10th Cir. 2004)
- *Hawkins v. Chater*, 113 F.3d 1162 (10th Cir. 1997)
- *White v. Barnhart*, 287 F.3d 903, 910 (10th Cir. 2002)
- *Hendron v. Colvin*, 767 F.3d 951, 956 (10th Cir. 2014)
- *Sanchez v. Saul*, 2020 WL 1236607, at *7 (D.N.M. Mar. 13, 2020)
- *Aguirre v. Saul*, 2019 WL 2552224, at *3 (W.D. Okla. June 20, 2019)
- *Staples v. Astrue*, 329 F. App'x 189, 191 & n.1 (10th Cir. 2009)
- *Keyes-Zachary v. Astrue*, 695 F.3d 1156, 1166 (10th Cir. 2012)
- *Bradley v. Colvin*, 643 F. App'x 674, 676 (10th Cir. 2016)
- *Suttles v. Colvin*, 543 F. App'x 824, 826 (10th Cir. 2013)
- *Farley v. Saul*, 2020 WL 7090536, at *5 (D.N.M. Dec. 4, 2020)
- *Flaherty v. Astrue*, 515 F.3d 1067, 1071 (10th Cir. 2007)

