

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Christian Dandrew Sandoval v. Commissioner of Social Security

Sandoval · No. 1:24-cv-00907-SAB · Decided August 25, 2025

SUMMARY

The United States District Court for the Eastern District of California affirmed the Commissioner of Social Security’s denial of Christian Dandrew Sandoval’s application for disability benefits. The court held that the Administrative Law Judge adequately evaluated the state-agency psychological opinions and Plaintiff’s subjective complaints, and that the decision was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Stanley A. Boone
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 25, 2025
DOCKET	1:24-cv-00907-SAB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Plaintiff's application for supplemental security income. The parties submitted briefs without oral argument and consented to jurisdiction by a United States Magistrate Judge.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision for legal error and substantial evidence under 42 U.S.C. § 405(g). It may not substitute its judgment for the ALJ's, and must uphold the ALJ's reasonable interpretation when the evidence is susceptible to more than one rational interpretation. Any error is harmless if inconsequential to the ultimate nondisability determination.
PRECEDENTIAL VALUE	unpublished
PARTIES	Christian Dandrew Sandoval v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ sufficiently explained why the opinions of state-agency psychological reviewers regarding Plaintiff's moderate limitation in interacting with supervisors were not fully persuasive.
2. Whether the ALJ provided legally sufficient, specific, clear, and convincing reasons for discounting the alleged intensity, persistence, and limiting effects of Plaintiff's subjective mental-health symptoms.

HOLDINGS

1. The ALJ did not err in discounting the state-agency reviewers' conclusions that Plaintiff had a moderate limitation in interacting with supervisors because the ALJ sufficiently explained that the limitation was inconsistent with medical evidence showing cooperative behavior during examinations and with school records showing appropriate communication and cooperation with staff.
2. The ALJ did not err in discounting Plaintiff's subjective complaints because the ALJ provided sufficiently specific, clear, and convincing reasons, including inconsistencies with the medical record, conservative and routine treatment, treatment noncompliance and continued marijuana use despite medical advice, improvement during sobriety and with medication, and generally normal mental-status findings.

KEY QUOTATIONS

"An error is harmless only if it is 'inconsequential to the ultimate nondisability determination.'"

"The standard isn't whether [a] court is convinced, but instead whether the ALJ's rationale is clear enough that it has the power to convince."

"The Court finds that the ALJ sufficiently explained the reasoning for discounting those portions of the state-agency consultative opinions."

"Taken together, the ALJ's 'rationale [for discounting Plaintiff's alleged symptoms] is clear enough that it has the power to convince.'"

FACTUAL BACKGROUND

Plaintiff alleged disability beginning October 1, 2021, based primarily on anxiety, mood disorder, and cannabis use disorder. The ALJ found that Plaintiff had severe anxiety and mood disorder and cannabis use disorder, but retained the residual functional capacity for work at all exertional levels with hazard restrictions, simple instructions, and occasional interaction with coworkers and the public. The ALJ relied on largely cooperative examinations, reported symptom improvement with medication and periods of sobriety, continued marijuana use despite medical advice to stop, and the absence of more intensive treatment. The district court concluded that substantial evidence supported the ALJ's evaluation of the medical opinions and Plaintiff's subjective complaints.

PROCEDURAL HISTORY

Plaintiff protectively filed an application for supplemental security income on January 19, 2022. The application was denied initially and on reconsideration, and an ALJ held a hearing on September 6, 2023. The ALJ found Plaintiff not disabled on November 29, 2023, and the Appeals Council denied review on June 24, 2024. The district court affirmed the Commissioner's decision and directed entry of judgment for Defendant.

DISPOSITION

affirmed

CASES CITED

- Batson v. Comm’r of Soc. Sec. Admin., 359 F.3d 1190, 1194 (9th Cir. 2004)
- Stout v. Comm’r, Soc. Sec. Admin., 454 F.3d 1050, 1052, 1055-56 (9th Cir. 2006)
- Ford v. Saul, 950 F.3d 1141, 1148-49, 1154 (9th Cir. 2020)
- Vertigan v. Halter, 260 F.3d 1044, 1049 (9th Cir. 2001)
- Lounsbury v. Barnhart, 468 F.3d 1111, 1114 (9th Cir. 2006)
- Osenbrock v. Apfel, 240 F.3d 1157, 1162 (9th Cir. 2001)
- Han v. Bowen, 882 F.2d 1453, 1457 (9th Cir. 1989)
- Woods v. Kijakazi, 32 F.4th 785, 791-92 (9th Cir. 2022)
- Scott T. C. v. Commissioner of Social Security, No. 1:23-cv-01776-SAB, 2025 WL 227288, at *6 (E.D. Cal. Jan. 17, 2025)
- Tina R. v. Commissioner of Social Security, No. C18-1041JLR, 2019 WL 1417301, at *5 (W.D. Wash. Mar. 29, 2019)
- Lewis v. Apfel, 236 F.3d 503, 517 n.13 (9th Cir. 2001)
- Reddick v. Chater, 157 F.3d 715, 720 (9th Cir. 1998)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Stiffler v. O’Malley, 102 F.4th 1102, 1106 (9th Cir. 2024)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Flaten v. Sec’y of Health & Human Servs., 44 F.3d 1453, 1457 (9th Cir. 1995)
- Leach v. Kijakazi, 70 F.4th 1251, 1255 (9th Cir. 2023)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Shinseki v. Sanders, 556 U.S. 396, 409 (2009)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Connett v. Barnhart, 340 F.3d 871, 874 (9th Cir. 2003)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Garrison v. Colvin, 759 F.3d 995, 1010 (9th Cir. 2014)
- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- Brown-Hunter v. Colvin, 806 F.3d 487, 488-89 (9th Cir. 2015)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1102 (9th Cir. 2014)

- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Carmickle v. Commissioner, Social Security Administration, 533 F.3d 1155, 1161 (9th Cir. 2008)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)

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