

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Nicholas D. v. Frank Bisignano, Commissioner of Social Security
Administration

Nicholas D. · No. 4:25 CV 126 JMB · Decided January 14, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri reviewed the denial of Nicholas D.'s application for Social Security disability insurance benefits. The court found the Administrative Law Judge's residual functional capacity assessment internally inconsistent and inadequately supported, particularly regarding the treatment of the plaintiff's anxiety and panic attacks. The court reversed the Commissioner's decision under sentence four of 42 U.S.C. § 405(g) and remanded for further consideration.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	John M. Bodenhausen
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	January 14, 2026
DOCKET	4:25 CV 126 JMB
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under sentence four of 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ's findings are supported by substantial evidence in the record as a whole, considering evidence that supports and detracts from the decision. The court must affirm if the decision falls within the evidence-defined zone of choice, but may not uphold an internally inconsistent or inadequately explained RFC assessment.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Nicholas D. v. Frank Bisignano, Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

exhaustion of remedies

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained and supported the RFC finding that Plaintiff could perform full-time work with specified non-exertional limitations.
2. Whether the ALJ improperly discounted Plaintiff's subjective complaints concerning anxiety and panic attacks solely because the symptoms were not sufficiently documented by objective medical evidence or witnessed by medical providers.
3. Whether Plaintiff's ability to perform household chores and provide limited caregiving supported a finding that he could sustain full-time competitive employment.

HOLDINGS

1. The RFC assessment was internally inconsistent and insufficiently explained because the ALJ found the agency physicians' opinions not persuasive based on an allegedly vague phrase but appeared to adopt those opinions, while also failing to identify a coherent evidentiary basis for the resulting work limitations.
2. An ALJ may not discount a claimant's subjective complaints solely because they are unsupported by objective medical evidence, and a claimant is not required to display a disabling condition to a medical provider for symptoms to be found credible.
3. The ability to perform some household chores or provide limited care for a family member does not, by itself, establish the ability to perform full-time competitive work day after day.

KEY QUOTATIONS

"However, an ALJ must do more than point to the lack of objective medical evidence."

"Certainly, an ALJ need not include limitations in an RFC based on evidence that he finds not credible."

FACTUAL BACKGROUND

Plaintiff alleged disability beginning August 10, 2021, based primarily on major depressive disorder, anxiety disorders, panic attacks, and bipolar disorder with mixed features. The ALJ found severe mental impairments and moderate limitations in the Paragraph B functional areas, but determined that Plaintiff could perform work at all exertional levels subject to non-exertional restrictions, including no public interaction, only occasional

interaction with coworkers and supervisors, and no tandem tasks. Plaintiff reported frequent panic attacks, substantial difficulty functioning, and an inability to sustain full-time employment, while the record also reflected some household activities and caregiving for an ill aunt. The district court found the RFC reasoning internally inconsistent and inadequately supported because the ALJ discounted Plaintiff's symptoms principally for lack of objective documentation and did not adequately reconcile the medical evidence, expert opinions, and treatment history.

PROCEDURAL HISTORY

Nicholas D. applied for disability insurance benefits under Title II of the Social Security Act. An Administrative Law Judge denied the claim, and the Commissioner issued a final decision on December 6, 2024. After exhausting administrative remedies, Plaintiff sought review in the Eastern District of Missouri, arguing that the ALJ improperly assessed his residual functional capacity and his subjective complaints concerning anxiety and panic attacks. The court reversed and remanded for further administrative consideration.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must reconsider the claim, tie the RFC to evidence in the record, provide a consistent assessment of the agency experts' opinions, and reconcile Plaintiff's non-linear treatment history with the ability to maintain full-time employment. The court did not direct an award of benefits and permitted the ALJ to reach the same ultimate conclusion on a properly supported record.

CASES CITED

- Ross v. O'Malley, 92 F.4th 775, 778 (8th Cir. 2024)
- Juszczuk v. Astrue, 542 F.3d 626, 631 (8th Cir. 2008)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Cox v. Astrue, 495 F.3d 614, 617 (8th Cir. 2007)
- Moore v. Astrue, 572 F.3d 520, 523 (8th Cir. 2009)
- Hurd v. Astrue, 621 F.3d 734, 738 (8th Cir. 2010)
- Howard v. Massanari, 255 F.3d 577, 581 (8th Cir. 2001)
- Buckner v. Astrue, 646 F.3d 549, 556 (8th Cir. 2011)
- Schmitt v. Kijakazi, 27 F.4th 1353, 1360 (8th Cir. 2022)
- Wagner v. Astrue, 499 F.3d 842, 851 (8th Cir. 2007)
- Tellez v. Barnhart, 403 F.3d 953, 957 (8th Cir. 2005)
- Grindley v. Kijakazi, 9 F.4th 622, 630-631 (8th Cir. 2021)
- Halverson v. Astrue, 600 F.3d 922, 931 (8th Cir. 2010)
- Polaski v. Heckler, 739 F.2d 1320, 1322 (8th Cir. 1984)

- Chismarich v. Berryhill, 888 F.3d 978, 980 (8th Cir. 2018)
- Wymer v. Saul, No. 4:19-CV-2616-MTS, 2021 WL 1889870, at *9 (E.D. Mo. May 11, 2021)
- Vick v. Saul, No. 1:19 CV 232 CDP, 2021 WL 663105, at *8 (E.D. Mo. Feb. 19, 2021)
- Renstrom v. Astrue, 680 F.3d 1057, 1066 (8th Cir. 2012)
- Nash v. Commissioner, Social Security Administration, 907 F.3d 1086, 1090 (8th Cir. 2018)
- Julin v. Colvin, 826 F.3d 1082, 1086 (8th Cir. 2016)
- Reed v. Barnhart, 399 F.3d 917, 923 (8th Cir. 2005)
- Buckner v. Apfel, 213 F.3d 1006, 1011 (8th Cir. 2000)
- Wildman v. Astrue, 596 F.3d 959, 969 (8th Cir. 2010)

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