

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, CENTRAL DIVISION

Charlotte R. Martin v. Social Security Administration, Commissioner

Martin · No. 4:25-CV-00596-KGB-ERE · Decided February 5, 2026

SUMMARY

This Recommended Disposition addresses Charlotte R. Martin’s appeal from the Commissioner of Social Security’s denial of disability benefits. The magistrate judge recommends affirming the decision, concluding that the ALJ properly evaluated the record, the severity of Martin’s impairments, her subjective complaints, her residual functional capacity, and her ability to perform past relevant work. The disposition was dated February 5, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
WRITING FOR THE COURT	Edie R. Ervin, United States Magistrate Judge
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	February 5, 2026
DOCKET	4:25-CV-00596-KGB-ERE
DISPOSITION	affirmed
PROCEDURAL POSTURE	Martin sought judicial review of the Commissioner's final decision denying her application for Social Security disability benefits. The magistrate judge issued a Recommended Disposition recommending that the district court affirm the Commissioner's decision and enter judgment for the Commissioner.
STANDARD OF REVIEW	The court reviewed the Commissioner's decision for legal error and determined whether it was supported by substantial evidence on the record as a whole. The court considered evidence supporting and contradicting the decision but would not reverse merely because substantial evidence also supported the opposite outcome.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Charlotte R. Martin v. Social Security Administration, Commissioner

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QUESTIONS PRESENTED

1. Whether the ALJ failed to fully develop the administrative record by not ordering a consultative examination or contacting Martin's medical providers.
2. Whether the ALJ erred in finding Martin's anxiety and depression non-severe at step two.
3. Whether the ALJ improperly evaluated Martin's subjective complaints of pain and other symptoms.
4. Whether the ALJ's residual functional capacity finding failed to include all supported limitations.
5. Whether substantial evidence supported the step-four finding that Martin could perform her past relevant work as a customer order clerk.

HOLDINGS

1. The ALJ did not err by declining to order a consultative examination or obtain additional medical evidence because the existing record provided a sufficient basis for an informed decision.
2. The ALJ did not err in finding Martin's anxiety and depression non-severe because the impairments had no more than a minimal effect on her ability to perform basic work activities.
3. The ALJ properly evaluated Martin's subjective complaints because the decision considered the objective medical evidence, pain, treatment, work history, and daily activities, and reasonably found her allegations inconsistent with the record as a whole.
4. The ALJ's sedentary RFC with additional postural restrictions was supported by the medical evidence and included the limitations that the ALJ found credible.
5. Substantial evidence supported the ALJ's finding that Martin could perform her past relevant work as a customer order clerk, both as actually and generally performed.

KEY QUOTATIONS

“In this appeal, the Court must review the Commissioner’s decision for legal error and determine whether the decision is supported by substantial evidence on the record as a whole.” (Discussion, subsection A)

“An ALJ need not explicitly discuss each factor, and may “decline to credit a claimant’s subjective complaints if the evidence as a whole is inconsistent with the claimant’s testimony.”” (Discussion, subsection C.3)

“A claimant’s RFC represents the most he can do despite the combined effects of all of her credible limitations and must be based on all credible evidence.” (Discussion, subsection C.4)

FACTUAL BACKGROUND

Charlotte R. Martin applied for benefits based on lower back problems, difficulty ambulating, left-leg numbness, depression, and anxiety. The ALJ found severe impairments consisting of degenerative disc disease, degenerative joint disease of the hip, and hypertension, but found her anxiety and depression non-severe. The ALJ limited Martin to sedentary work with postural restrictions and, based on vocational-expert testimony, found that she could perform her past relevant work as a customer order clerk. The administrative record reflected conservative treatment, generally normal mental-health findings, daily activities including self-care, simple meal preparation, shopping, driving, and pet care, and work performed after the alleged onset date.

PROCEDURAL HISTORY

Martin applied for disability benefits based on physical and mental impairments. Her claim was denied initially and on reconsideration. After an administrative hearing, the ALJ found that she was not disabled because she retained the residual functional capacity for sedentary work and could perform her past relevant work as a customer order clerk. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Martin then sought review in the district court, which recommended affirmance.

DISPOSITION

affirmed

CASES CITED

- Brown v. Colvin, 825 F.3d 936, 939 (8th Cir. 2016)
- Halverson v. Astrue, 600 F.3d 922, 929 (8th Cir. 2010)
- Slusser v. Astrue, 557 F.3d 923, 925 (8th Cir. 2009)
- Milam v. Colvin, 794 F.3d 978, 983 (8th Cir. 2015)
- Long v. Chater, 108 F.3d 185, 187 (8th Cir. 1997)
- McCoy v. Astrue, 648 F.3d 605, 612 (8th Cir. 2011)
- Naber v. Shalala, 22 F.3d 186, 189 (8th Cir. 1994)
- Adamczyk v. Saul, 817 F. App'x 287, 290 (8th Cir. 2020)
- Milam v. Colvin, 794 F.3d 978, 985 (8th Cir. 2015)
- Harvey v. Colvin, 839 F.3d 714 (8th Cir. 2016)
- Kendrick v. Social Security Administration, No. 4:24-CV-00221-KGB, 2025 WL 548271 (E.D. Ark. Feb. 19, 2025)
- Gonzales v. Barnhart, 465 F.3d 890, 894 (8th Cir. 2006)
- Bowen v. Yuckert, 482 U.S. 137, 141 (1987)
- Page v. Astrue, 484 F.3d 1040, 1043 (8th Cir. 2007)
- Gowell v. Apfel, 242 F.3d 793, 796 (8th Cir. 2001)
- Andrews v. Colvin, 791 F.3d 923, 929 (8th Cir. 2015)
- Grindley v. Kijakazi, 9 F.4th 622, 630 (8th Cir. 2021)
- Schwandt v. Berryhill, 926 F.3d 1004, 1012 (8th Cir. 2019)

- Ostronski v. Chater, 94 F.3d 413, 418 (8th Cir. 1996)
- McGeorge v. Barnhart, 321 F.3d 766, 769 (8th Cir. 2003)

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