

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Valle-Ortiz v. Bisignano

Civil No. 25-1413 (MBA) (D.P.R. May 22, 2026) · No. Civil No. 25-1413 (MBA) · Decided May 22, 2026

SUMMARY

The United States District Court for the District of Puerto Rico reviews the Commissioner of the Social Security Administration’s denial of Emmanuel Valle-Ortiz’s claim for disability insurance benefits. The court rejects challenges concerning the fairness of the administrative hearing, medication side effects, and evaluation of medical opinions, and affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Mariana E. Bauzá-Almonte
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	May 22, 2026
DOCKET	Civil No. 25-1413 (MBA)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The district court reviewed the administrative record and affirmed the Commissioner's decision.
STANDARD OF REVIEW	The court determines whether the Commissioner and the Commissioner's delegates applied the correct legal standards and whether the findings are supported by substantial evidence. Factual findings are conclusive when supported by substantial evidence, but not when they result from ignoring evidence, misapplying the law, or judging matters entrusted to experts.
PRECEDENTIAL VALUE	unpublished
PARTIES	Emmanuel Valle-Ortiz v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

due process

QUESTIONS PRESENTED

1. Whether the ALJ violated Valle-Ortiz's due-process rights or failed to ensure a full and fair hearing when Valle-Ortiz appeared without representation at the supplementary hearing.
2. Whether the ALJ erred by failing to discuss the type, dosage, side effects, or functional impact of Valle-Ortiz's medications.
3. Whether the ALJ adequately evaluated medical opinions and prior administrative findings under the supportability and consistency factors in 20 C.F.R. § 404.1520c.

HOLDINGS

1. The ALJ did not violate due process or fail to ensure a full and fair hearing because Valle-Ortiz had notice of his right to representation, understood that right after the ALJ clarified the question, voluntarily chose to proceed without representation, and failed to show prejudice or unfairness attributable to self-representation.
2. The ALJ did not err by omitting a separate discussion of medication side effects because the evidence relied upon was outside the relevant eligibility period, Valle-Ortiz did not report side effects during the relevant period, and medical-expert testimony indicated that his medications imposed no additional limitations.
3. The ALJ adequately applied the supportability and consistency factors under 20 C.F.R. § 404.1520c, and substantial evidence supported the ALJ's treatment of the medical opinions and prior administrative findings.

KEY QUOTATIONS

“The Court’s review is limited to determining whether the Commissioner and his delegates employed the proper legal standards and found facts upon the proper quantum of evidence.” (1)

“There is, however, a statutory and regulatory obligation for the Commissioner to notify claimants of the options for obtaining attorneys and the availability to qualifying claimants of legal services organizations which provide legal services free of charge.” (8)

“In short, contrary to Valle’s claims, it is clear from the record and the transcript of the hearing that he had both time and opportunity to seek representation, that it was an informed decision, and that his final waiver of representation at the January 29, 2025 hearing was voluntary, knowing, and intelligent.” (9)

“In light of the foregoing, I find that the decision of the ALJ is supported by substantial evidence and free of legal error. Therefore, the decision of the Commissioner is hereby AFFIRMED.” (15)

FACTUAL BACKGROUND

Valle-Ortiz alleged disability based on lumbar spine and lower-extremity impairments, peripheral neuropathy, major depressive disorder, and acute stress disorder. The ALJ found that he was not engaged in substantial gainful activity, had severe impairments, did not meet or equal a listed impairment, and retained the residual functional capacity for a restricted range of light work. Although the ALJ found that Valle-Ortiz could not perform past relevant work, the ALJ determined at Step Five that he could perform jobs existing in significant numbers in the national economy. The district court found that the administrative record supported the ALJ's findings and rejected challenges concerning self-representation, medication side effects, and evaluation of medical opinions.

PROCEDURAL HISTORY

Valle-Ortiz applied for disability insurance benefits alleging disability from October 27, 2020, through June 30, 2022. The claim was denied initially and on reconsideration. Following hearings before an administrative law judge, including a supplementary hearing at which Valle-Ortiz appeared without a representative, the ALJ issued an unfavorable decision on April 7, 2025. The Appeals Council denied review, and Valle-Ortiz filed this action. The parties consented to proceed before the magistrate judge, who affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Manso-Pizarro v. Secretary of Health & Human Services, 76 F.3d 15, 16 (1st Cir. 1996)
- Nguyen v. Chater, 172 F.3d 31, 35 (1st Cir. 1999)
- Da Rosa v. Secretary, 803 F.2d 24, 26 (1st Cir. 1986) (per curiam)
- Ortiz v. Secretary of Health & Human Services, 955 F.2d 765, 769 (1st Cir. 1991)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Rodríguez Pagán v. Secretary of Health & Human Services, 819 F.2d 1, 3 (1st Cir. 1987)
- Lizotte v. Secretary of Health and Human Services, 654 F.2d 127, 128 (1st Cir. 1981)
- Bowen v. Yuckert, 482 U.S. 137, 146 (1987)
- Mills v. Apfel, 244 F.3d 1, 2 (1st Cir. 2001)
- Freeman v. Barnhart, 274 F.3d 606, 608 (1st Cir. 2001)
- Santiago v. Secretary of Health & Human Services, 944 F.2d 1, 5 (1st Cir. 1991)
- Ortiz v. Secretary of Health & Human Services, 890 F.2d 520, 524 (1st Cir. 1989)
- Cruz Rivera v. Secretary of Health & Human Services, 818 F.2d 96, 97 (1st Cir. 1987)
- Jimenez-Cruz v. Astrue, No. CIV. 09-1812 (MEL), 2012 WL 1207387, at *9, 2012 U.S. Dist. LEXIS 51678, at *26 (D.P.R. Apr. 11, 2012)
- Méndez v. Commissioner of Social Security, 300 F. Supp. 2d 317, 321 (D.P.R. 2003)
- Walker v. Massanari, 149 F. Supp. 2d 843, 846 (S.D. Iowa 2001)

- Clauson v. City of Springfield, 848 F. Supp. 2d 63, 70 (D. Mass. 2012)
- Mallett ex rel. Mallett v. Barnhart, No. 01-2337, 2002 WL 32096587, at *5 n. 2, 2002 U.S. Dist. LEXIS 26679, at *15 n. 2 (E.D.N.Y. Sept. 1, 2002)
- Evangelista v. Secretary of Health & Human Services, 826 F.2d 136, 142-43 (1st Cir. 1987)
- Steward v. Barnhart, 222 F. Supp. 2d 60, 63 (D. Me. 2001)
- United States v. Zannino, 895 F.2d 1, 17 (1st Cir. 1990)
- Boothby v. Social Security Administration Commissioner, CIV. No. 97-1245, 1997 WL 727535, at *1-2, 1997 U.S. App. LEXIS 32746, at *4 (1st Cir. Nov. 18, 1997)
- Freese v. Astrue, No. 07-1-P-S, 2007 WL 2710341, at *7, 2007 U.S. Dist. LEXIS 68021, at *22 (D. Me. Sept. 12, 2007)
- Leach v. Apfel, No. 00-92-B, 2000 WL 1511197, at *2, *4, 2000 U.S. Dist. LEXIS 14831, at *6, *11 (D. Me. Oct. 5, 2000)
- Lacroix v. Barnhart, 352 F. Supp. 2d 100, 115 (D. Mass. 2005)
- Arnold v. Saul, No. 1:19-CV-151-HAB, 2020 WL 1983695, at *3 (N.D. Ind. Apr. 27, 2020)

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